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HUMAN RESOURCE DEVELOPMENT POLICY

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DOCUMENT CONTROL

DOCUMENT NAME	Human Resource Development Policy
ABSTRACT	This document details the HRD policy – guidelines for the management and employees
DOCUMENT REFERENCE	HRD001

AUTHORISATION

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SECURITY CLASSIFICATION: Company Confidential**DISTRIBUTION LIST**

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Copies: Electronic only

VERSION HISTORY

VERSION	DATE	PREPARED BY	CHANGES & REASONS FOR CHANGE
Draft 0.1	25/10/2019	Lavanya V	
Issue 1.0	03/08/2020	Lavanya V	
Issue 2.0	08/12/2023	Bindu Tiwari	Revision of Retirement policy.
Issue 3.0	09/09/2025	Amrita Thakur & Mrunal Thoolkar	Revision of Designations & Performance Reviews policy. Revision of Probation & Separation policy.

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1. PURPOSE AND OBJECTIVE

The purpose of this document is to familiarise all the employees of the Company with the rules and regulations governing their day-to-day activities in the Company, different entitlements and facilities available to them and the human resource development (“HRD”) policies of the Company.

This policy does not constitute a contract/agreement between the Company and its employees. The Company has voluntarily adopted this policy. It has the sole authority to make suitable deviations to the general provisions specified in this policy and can amend or withdraw this policy at any time with or without prior notice.

2. SCOPE AND COVERAGE

The provisions of this policy will govern all employees, unless specified otherwise. Wherever an employee is specifically advised about any particular provision/issue, the communication so issued will prevail over the provisions specified in this policy. In the absence of a specific understanding with the employee, provisions specified in this policy and as amended from time to time, will prevail. All references/ clarifications/ questions regarding interpretation of any provision can be made to the HRD department. The Company’s decisions on all such matters shall be final and binding on the employee. All references to the masculine gender are intended to include, depending on the context, feminine gender also.

3. EMPLOYMENT TERMS

Every employee shall work faithfully, sincerely, diligently and efficiently to the best of his/her ability and make his best efforts to use his knowledge and skill for the development and growth of the Company. The Company expects the highest level of honesty, integrity and efficacy from all its employees in their business as well as personal dealings.

Employment with the Company is subject to an employee’s preparedness to be assigned to work in any function/ location as desired by the Company from time to time. The Company also reserves the option of assigning an employee to areas/responsibilities, which may not necessarily be within his core competencies, depending upon business exigencies.

All potential candidates seeking employment with the Company are required to submit all relevant documents to prove their qualifications, experience and other details stated in their curriculum vitae submitted to the Company. Normally, a list of documents to be submitted by

a candidate seeking employment with the Company will be furnished to the candidate beforehand. The Company reserves the absolute right not to accept a candidate on its rolls or after such acceptance, to discharge him/her from the rolls, in case these requirements are not fulfilled. All the employees on the rolls of the company too are required to submit relevant documents relating to their qualifications and experience, etc., in case the same have not been submitted at the time of their joining the company.

Appointment and continuation on the Company's rolls solely depends on the information furnished by a candidate/employee. The Company reserves the total authority to revoke an appointment if at any time it comes to light that the information so furnished is factually incorrect, or any relevant information has been withheld, suppressed, misstated, unstated, understated or misrepresented. In all such cases, the appointment will become *abinitio* void.

4. WORKING HOURS

Normal working hours are from 9.30 A.M. to 6.30 P.M. (Monday to Friday. Number of hours and actual timings can differ depending on the Company's work requirement and specific engagement assigned to the individual employee.

When allocating job responsibilities to employees, efforts will be made to ensure that the quantum of work is such that, it can normally be completed during regular working hours. The Company believes that it is then the task of the employees to complete the assigned work during the normal working day. However, since the Company is in the services business, it is required to be in continuous and constant interaction with market requirements/ clients. Therefore, working beyond regular office hours will sometimes be unavoidable and all employees across all departments are expected to co-operate and work late on weekdays, weekends and paid holidays, when necessary.

The Company expects all employees to report to work on a reliable and punctual basis. Absenteeism, early departures from work, and late arrivals burden the fellow employees and the Company. If an employee cannot avoid being late to work or is unable to work as scheduled, he/she must call and inform his/her Manager as soon as possible. Every time an employee is absent or late, or leaves early, he/she must provide his/her Manager with an honest reason or explanation. The employee must also inform his/her Manager of the expected duration of any absence. The Company will comply with applicable laws relating to time off from work, but it is the employee's responsibility to provide sufficient information to enable the Company to make a determination. The employee must notify his/her Manager of any change in his leave status as soon as possible.

Excessive absenteeism and continuing patterns of absences, early departures -- regardless of the exact number of days -- may warrant disciplinary action leading to and including termination of employment. Individuals with disabilities may be granted reasonable accommodation in complying with these policies if undue hardship does not result to the Company's operations. However, regular attendance and promptness are considered part of each employee's essential job functions.

5. *IDENTITY BADGES AND DRESS CODE*

All employees should wear on their person, identity badges within the office premises. Any employee not adhering to this security requirement is liable for denial of entry into the office premises.

As regards the dress code, all client facing employees are expected to be in business formal attire or as suitable for client premises and other employees in business casuals.

6. *DESIGNATIONS AND PERFORMANCE REVIEWS*

The pattern of role-based designations applicable within the Company is defined and published on the HR portal on Sharepoint. Designations are purely to build a correlation with the role-based responsibilities.

The first performance review of an employee, for the purpose of confirmation into a permanent role, will be conducted at the end of the probation period, unless specified otherwise. (probation period). Thereafter, performance reviews for increment will be annual and will be effective April of every year. All confirmed employees would be considered for this annual review process.

Performance evaluations will be conducted to provide both the employee and the Manager with the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss methods for improving individual performance. However, a positive performance evaluation does not guarantee an increase in salary, a promotion, or even continued employment. Compensation increases and the terms and conditions of employment, including job assignments, transfer, and promotions, will be determined by and at the discretion of the Company. Methodology of review will be to the discretion of the company et a brief framework may be disclosed if the management deems appropriate.

In addition to the formal performance evaluations, the Company encourages employees and their respective Managers to discuss job performance on an ongoing basis.

The Company believes in the principle that employees should be given the opportunity to demonstrate their abilities and continually improve their job performance. Where performance

problems exist, employees should be told about these deficiencies and given an opportunity to improve. When the Company determines that an employee is a candidate for improvement, the Company will attempt to help the employee to meet the Company's expectations.

7. REMUNERATION

The Company believes in ensuring a very competitive remuneration package to all its employees in terms of basic pay, long-term benefits, social security arrangements, taxation and statutory compliance's, location of an employee at a given point of time, seniority of the employee, his role fitment, etc. The salary structure currently in force in the Company addresses all these issues. Every individual employee will be notified in his appointment letter and thereafter from time to time the exact overall remuneration package applicable to him as well as distribution thereof into different components. ***The remuneration package is strictly confidential between the employee and the Company and is not to be discussed or disclosed to any third party colleagues, and employees in any manner whatsoever.*** All payments in terms of the remuneration package will be subject to deduction of tax at source, as per relevant laws, rules and regulations in force from time to time. Further, the remuneration package (including all employee benefit schemes and incentive schemes) is subject to modification from time to time at the Company's discretion without any adverse Impact on the sum total.

For purposes of contributions to Provident Fund, Superannuation Fund, retiral benefits (if applicable), Exgratia/Statutory Bonus, encashment of leave, and notice pay, computations will be on the basis of Basic Pay or as prescribed by local laws.

As required under the Income Tax Act of the different regions, and the rules made there under, emoluments in the remuneration package which attract tax will be so taxed.

Employees shall be reimbursed in full for all reasonable business-related expenses incurred during the performance of services hereunder, including expenses incurred in travel. Reimbursements will be made upon presentation of itemized account of expenditures, together with supporting vouchers. It is understood that the following expenses are not contemplated to be within the scope of reimbursable expenses, and shall be borne by the employee himself:

- Personal travel expenses
- Home office expenses
- All expenses not deductible by Company under appropriate regional Income Tax Act.

8. REIMBURSEMENTS FORMING PART OF COST TO COMPANY

All reimbursements will be done against the production of appropriate bills only. In case an employee does not submit the bill, the amount due shall be paid as an allowance. Employees may claim the reimbursements at any convenient time during the financial year. All employees desirous of claiming any reimbursements must submit all bills to the Finance department.

9. REIMBURSEMENT FOR TRAVEL AND BOARDING ON OFFICIAL VISITS

Employees will be reimbursed for reasonable expenses incurred in the course of business when authorized by concerned Manager. These expenses will include air travel, hotels, motels, meals, cab fare, rental vehicles, or gas and car mileage for personal vehicles. The Company will have no obligation in respect of expenses incurred without prior authorization. The expense statement should be submitted to the Company along with the receipts within 10 days from the date of the expenditure. In case an employee takes an advance and fails to clear the advance within this stipulated time, the entire advance will be recovered from the employee's subsequent month's salary.

Employees are expected to exercise restraint and good judgment when incurring expenses. Employees should contact the HRD/Finance department in advance if they have any question about whether an expense will be reimbursed.

Employees should refer to the International Travel Policy and respective Domestic Travel Policy for details.

10. REFERRAL INCENTIVE

Employees are encouraged to refer their friends for employment with the Company. This will build a strong and cohesive environment. Employees will be given an incentive when the Company finally employs anyone referred by them. The rate of incentive amount will be as per the "employee referral bonus" published on HR Portal on sharepoint. This incentive is given to encourage the recruitment of credible and experienced persons as employees and should not be viewed as a mode of earnings by the existing employees.

11. TRANSFERS AND RELOCATION

An employee may initially be appointed at a particular office of the Company. However, services of every employee are liable for transfer to any of the Company's other offices/divisions. In the event of such a transfer/deputation, details of the terms and conditions including modifications if any in the employee's emoluments will be communicated to the employee at an appropriate time.

Employee can refer to travel policies and relocation policies as relevant. Employee can reach HRD team for any clarifications.

12. HOLIDAYS

All employees are eligible for paid holidays in a calendar year for celebrating various festivities. The HRD department in the last week of December of every year for the subsequent year will announce a list of these holidays.

13. LEAVE

All confirmed employees of the Company (i.e. employees who have completed their probation period) are eligible for various types of leaves. *Employee should refer to the leave policy of the respective region.*

14. PROBATION AND SEPARATION

Unless otherwise notified, every employee shall, immediately upon joining the Company, be placed on probation.

- For lateral hires, the probation period will be 6 months.
- All employees hired at the Associate Consultant level will serve a probation period of 1 year.
- Employees hired at the Senior Associate Consultant level under the InvenioNXT program will also serve a probation period of 1 year.

At the end of the applicable probation period, the employee will either be confirmed, or their probation will be extended or intimated of culmination of association with company without reasons, based on the performance feedback received from the manager. In case a probation extension is granted, if the employee does not demonstrate satisfactory improvement in the key areas identified during the extension period, it may lead to termination of employment. The notice period applicable upon confirmation will be as specified in the individual's appointment

letter.

In case an employee desires to leave, Company will make all efforts not to inconvenience the employee in any manner. Similarly, the employee is also expected to ensure that the Company's interests, more particularly those relating to client-relationships, etc. are fully protected.

An employee seeking to leave the Company's services has to submit a formal written notice of resignation and complete all formalities including proper handing over of all responsibilities before leaving, in order to initiate the full and final settlement process.

When an employee serves on the Company a notice of termination of employment by submitting a resignation letter, Company shall have the option to waive the notice period partly or fully, without having to pay any salary or compensation for the notice period so waived. Company shall also have the option to decide: (a) whether the notice period shall run concurrently with the period of any leave which may be/ might have been granted; and (b) whether the notice period should stand extended to the extent of the leave availed of by the employee.

Every employee who does not owe any amounts to the Company and where there are no issues pending, will receive a resignation acceptance letter and an Employment/Service Certificate from the HRD department, soon after the final settlement process is over. In case an ex-employee owes some amount to the Company, these certificates will be issued soon after he/she pays the amount to the Company. In case of an employee who abandons his employment with the Company or leaves the Company without fulfilling the terms of his employment or any other requirements stipulated from time to time, no employment Certificate will be issued by the Company. The Company also reserves the option of not processing the full and final settlement in such cases and to pursue legal remedies under law to recover its dues from the employee.

Details regarding the notice period, adjustment against leave balance, leave during the notice period, waiver of the notice period, encashment of unavailed leave, recovery of money in lieu of the notice period are dealt with under different sections of this policy. All employees are requested to familiarize themselves with all these provisions.

An employee leaving the Company is requested to remain in touch with the Company and advise the Company about his permanent address and other contact details, from time to time.

Exit Interviews are conducted at the time an employee is leaving the Company with the objective of eliciting frank opinions about the Company's style of functioning, and suggestions for improvements, etc. Feedback generated through this process may be useful in improving the working atmosphere.

15. RETIREMENT

The superannuation age for all permanent employees of the Company is determined in accordance with local employment laws. Employees will continue on the Company's rolls upto and including the last calendar day of the calendar month in which they complete the age of retirement as determined by local employment laws.

For special skills, based on case to case, the retirement age extension can be considered while hiring/absorbing candidates as Full Time Employees, these cases will be considered as full-time employment but will not be given statutory benefits as per the law of the land.

16. PROHIBITED CONDUCT

In order to assure orderly operations and provide the best possible work environment, the Company expects employees to follow certain rules of conduct that will protect the interests and safety of personnel.

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace, but the following are examples of infractions of rules of conduct that may result in disciplinary action, including suspension, demotion, or termination of employment:

- **Falsification** of employment records, employment information, or other records.
- **Drug & Alcohol Abuse:** The Company maintains zero tolerance for drug and alcohol abuse by its employees. The use of any illegal drugs, intoxicants, or controlled substances is strictly prohibited. Illicit drug use and indiscriminate alcohol consumption puts everyone at risk and cannot be tolerated. In keeping with the Company's efforts to promote health and safety and protect the interests of its employees, clients and the Company, no employee will be allowed to use, possess, sell, manufacture, purchase, or be under the influence of alcohol, illegal drugs, intoxicants, or controlled substances at any time on Company premises, in Company vehicles or while on Company business. Furthermore, the involvement of employees in these activities off the job raises significant concerns for the Company and will be treated with equal severity.
- **Non-Fraternization:** The Company recognizes that employees may develop personal relationships in the course of their employment. However, in an effort to prevent favoritism, morale problems, disputes or misunderstandings and potential sexual harassment claims, Managers of the Company are not permitted to date or engage in sexual relationships with subordinate employees. Violation of this policy may result in discipline, including termination. Furthermore, coworkers are discouraged from dating or pursuing romantic or sexual relationships with each other unless they inform HR team in advance.
- **Smoking:** Employees, clients, vendors, and other guests are not allowed to smoke in Company facilities at any time. Smoking is not allowed in client areas, Company vehicles

or in rest rooms. In addition, employees are not permitted to smoke within 10 feet of any building entrance.

- **Harassment:** In accordance with applicable law, the Company prohibits sexual harassment and harassment because of race, colour, national origin, ancestry, religion, creed, physical or mental disability, age, or any other basis protected by law. All such harassment is unlawful and will not be tolerated.
- **Sexual Harassment:** Sexual harassment means unwanted sexual advances, requests for sexual favours, or visual, verbal, or physical conduct of a sexual nature when: (1) submission to the conduct is made a term or condition of employment; or (2) submission to or rejection of the conduct is used as basis for employment decisions affecting the individual; or (3) the conduct has the purpose or effect of unreasonably interfering with the Employee's work performance or creating an intimidating, hostile, or offensive working environment. This definition includes many forms of offensive behavior. The following is a partial list:
 - a. Unwanted sexual advances;
 - b. Offering employment benefits in exchange for sexual favors;
 - c. Making or threatening reprisals after a negative response to sexual advances;
 - d. Visual conduct such as leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, or posters;
 - e. Verbal conduct such as making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about any employee's body or dress;
 - f. Verbal sexual advances or propositions;
 - g. Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, or suggestive or obscene letters, notes, or invitations;
 - h. Physical conduct such as touching, assault, or impeding or blocking movements; and
 - i. Retaliation for reporting harassment or threatening to report harassment

It is unlawful for males to sexually harass females or other males and for females to sexually harass males or other females. Sexual harassment on the job is unlawful whether it involves coworker harassment, harassment by a Manager, or harassment by persons doing business with or for the Company.

- **Other Types of Harassment:** Prohibited harassment on the basis of race, colour, national origin, ancestry, religion, physical or mental disability, age, or any other protected basis, includes behavior similar to sexual harassment, such as:

- a. Verbal conduct such as threats, epithets, derogatory comments, or slurs;
 - b. Visual conduct such as derogatory posters, photographs, cartoons, drawings, or gestures;
 - c. Physical conduct such as assault, unwanted touching, or blocking normal movement; and
 - d. Retaliation for reporting harassment or threatening to report harassment
- **Liability For Harassment:** Any employee of the Company, whether a coworker or Manager, who is found to have engaged in harassment is subject to disciplinary action, up to and including discharge from employment. Any employee who engages in harassment, including any Manager or supervisor, who knew about the harassment but took no action to stop it, may be held personally liable for monetary damages. The Company does not consider conduct in violation of this policy to be within the course and scope of employment or the direct consequence of the discharge of the employee's duties. Accordingly, to the extent permitted by law, the Company reserves the right not to provide a defense or pay damages assessed against employees for conduct in violation of this policy.

Employee is encouraged to refer to POSH policy, Disciplinary Procedure and Grievance Procedures for additional details.

17. WORKPLACE VIOLENCE

The Company recognizes that violence in the workplace is a problem necessitating a firm, considered response by employers. The costs of workplace violence are great, both in human and financial terms. The Company believes that the safety and security of the employees is paramount. Therefore, the Company has adopted this policy regarding workplace violence.

Acts or threats of physical violence, including intimidation, harassment and/or coercion, that involve or affect the Company or that occur on Company property or in the conduct of Company business off Company property, will not be tolerated. This prohibition against threats and acts of violence applies to all persons involved in Company operations, including, but not limited to, the employees, contract workers, temporary employees, and anyone else on Company property or conducting Company business off-Company property. Violations of this policy, by any individual, will lead to disciplinary and/or legal action as appropriate.

Definitions: Workplace violence is any intentional conduct that is sufficiently severe, offensive or intimidating to cause an individual to reasonably fear for his or her personal safety or the safety of his or her family, friends and/or property such that employment conditions are altered or a hostile, abusive or intimidating work environment is created for one or several employees. Workplace violence may involve any threats or acts of violence occurring on Company

premises, regardless of the relationship between the Company and the parties involved in the incident. It also includes threats or acts of violence that affect the business interests of the Company or that may lead to an incident of violence on Company premises. Threats or acts of violence occurring off Company premises that involve employees, agents or individuals acting as a representative of the Company, whether as victims of or active participants in the conduct, may also constitute workplace violence. Specific examples of conduct that may constitute threats or acts of violence under this policy include, but are not limited to, the following:

- a. Threats or acts of physical or aggressive contact directed towards another individual;
- b. Threats or acts of physical harm directed towards an individual or his/her family, friends, associates, or property;
- c. The intentional destruction or threat of destruction of Company property or another employee's property;
- d. Harassing or threatening phone calls;
- e. Surveillance;
- f. Stalking;
- g. Veiled threats of physical harm or similar intimidation; and
- h. Any conduct resulting in conviction under the provisions of the respective country's Penal Code relating to violence or threats of violence that adversely affect the Company's legitimate business interests. Workplace violence does not refer to occasional comments of a socially acceptable nature. These comments may include references to legitimate sporting activities, popular entertainment or current events. Rather, it refers to behavior that is personally offensive, threatening, or intimidating.

Enforcement: Any person who engages in a threat or violent action on Company property may be removed from the premises as quickly as safety permits and may be required, at the Company's discretion, to remain off Company premises pending the outcome of an investigation of the incident.

When threats are made or acts of violence are committed by employee(s), a judgment will be made by the Company as to what actions are appropriate, including possible disciplinary action.

Once a threat has been substantiated, it is the Company's policy to put the threat maker on notice that he/she will be held accountable for his/her actions and then implement a decisive and appropriate response.

Under this policy, decisions may be needed to prevent a threat from being carried out, a violent act from occurring, or a life-threatening situation from developing. No existing policy

or procedure of the Company should be interpreted in a manner that prevents the making of these necessary decisions.

Important Note: The Company will make the sole determination of whether, and to what extent, the Company will act upon threats or acts of violence. In making this determination, the Company may undertake a case-by-case analysis in order to ascertain whether there is a reasonable basis to believe that workplace violence has occurred.

Employee is encouraged to refer to POSH policy, Disciplinary Procedure and Grievance Procedures for additional details.

18. PERSONNEL RECORDS

The information recorded in the personnel file is extremely important. Employees should make sure that the personal data in the file is accurate and up to date. Employees should report any change of address, phone number and other details to the HRD department.

Employees may inspect their personnel file in the presence of a representative of the Company. Employees may request copies of any documents from their file. If desired, an employee may add a written statement to the file explaining any disputed item.

Employees are encouraged to refer to Data Protection Policy and Data Retention Policy for additional details.

19. BUSINESS CONDUCT

Employees must decline or return any gift or gratuity from any client, vendor, supplier, or other person doing business with the Company. In doing so, the employee must explain that the Company prohibits employees from accepting gifts or gratuities to ensure that business decisions, transactions, and services are provided on an objective and professional basis.

The Company's success depends on satisfying the Company's clients/customers. Employees of the Company are expected to treat clients/customers courteously and with the utmost respect at all times. Employees must attend to clients' questions and demands promptly and professionally. If in need of assistance, it is encouraged to contact the Manager or another employee who may be able to assist the client/customer better.

Employees are encouraged to refer to Anti-Bribery and Anti-Corruption Policy.

20. *USE OF COMPANY EQUIPMENT*

All Company property - including, without limitation, desks, storage areas, work areas, lockers, file cabinets, computer systems, office telephones, cellular telephones, modems, facsimile machines, duplicating machines, and vehicles--must be used properly and maintained in good working order. Employees who lose, steal, or misuse Company property may be personally liable for replacing or fixing the item and may be subject to discipline, up to and including termination.

The Company reserves the right, at all times and without prior notice, to inspect and search any and all its property for the purpose of determining whether this policy or any other policy of the Company has been violated, or when an inspection and investigation is necessary for purposes of promoting safety in the workplace. These inspections may be conducted during or after business hours and in the presence or absence of the employee.

In addition, in order to ensure the safety and security of employees and clients, and to protect the Company's legitimate business interests, the Company reserves the right to question and inspect or search any employee or other individual entering into or leaving Company premises. The inspection or search may include any packages or items that the individual may be carrying, including briefcases, handbags, knapsacks, shopping bags, etc. These items are subject to inspection and search at any time, with or without prior notice. The Company may also require employees while on the job or on the Company's premises to agree to reasonable inspection of their person and/or personal property. The individual may be requested to self-inspect his or her personal property or person by displaying the contents of any packages and/or turning out his or her pockets, etcetera, in the presence of a representative of the Company, typically a management employee of the same gender.

Employees are otherwise permitted to use the Company's equipment for occasional, non-work purposes with permission from their Manager. Nevertheless, employees have no right of privacy as to any information or file maintained in or on Company property or transmitted through the Company. For purposes of inspecting, investigating, or searching employees' files or documents, the Company may override any applicable passwords, codes, or locks in accordance with the best interests of the Company, its employees, or its clients or visitors. All bills and other documentation related to the use of Company equipment or property are the property of the Company and may be reviewed and used for purposes that the Company considers appropriate.

Employees may access only files or documents that they have permission to enter. Unauthorized review, duplication, dissemination, removal, damage, or alteration of files, or other property of the Company, or improper use of information obtained by unauthorized means, may be grounds for disciplinary action, up to and including termination.

Use of Stationery and Mail Services: All engraved or printed Company stationery, envelopes, and other work materials are for Company business only. These materials may not be used for personal correspondence or non-business matters. When signing business letters on the Company's letterhead, the employee's name and title or position must be used.

Employees are requested not to send or receive personal mail using the Company's mail services. Employees will be asked to reimburse the cost of postage for non-business-related materials sent through the Company's mail services.

Use of Telephones: While at work, employees are expected to perform their job duties and responsibilities. Personal calls, both incoming and outgoing, must be kept to a minimum and must not interfere with duties and responsibilities or the Company policies. Employees should limit their use of Company telephones for personal long-distance calls. In the event it is necessary to make a personal long-distance call, employees will be asked to reimburse the Company for the cost.

21. USE OF TECHNOLOGY AND THE INTERNET

The Company's technical resources—including, but not limited to desktop and portable computer systems, fax machines, internet and world wide web (Web) access, voice mail, electronic mail (e-mail), electronic bulletin boards and instant messenger services, its intranet—enable employees to quickly and efficiently access and exchange information throughout the Company and around the world. When used properly, the Company believes that these resources greatly enhance employee productivity and knowledge. In many respects, these new tools are similar to other Company tools, such as stationery, file cabinets, photocopiers and telephones.

This policy applies to all technical resources that are owned or leased by the Company, that are used on or accessed from the Company's premises, or that are used on Company business. This policy also applies to all activities using any Company-paid accounts, subscriptions, or other technical services, such as Internet and World Wide Web access, voice mail, and e-mail, whether or not the activities are conducted from Company premises.

Note: As an employee uses the Company's technical resources, it is important to remember the nature of the information created and stored there. Because they seem informal, e-mail messages are sometimes offhand, like a conversation, and not as carefully thought out as a letter or memorandum. Like any other document, an e-mail message or other computer information can later be used to indicate what an employee knew or felt. So, employees should keep this in mind when creating e-mail messages and other documents. Even after deleting an e-mail message or closing a computer session, it may still be recoverable and may even remain on the Company's system.

Acceptable Uses: The Company's technical resources are provided for the benefit of the Company and its clients, vendors, and suppliers. These resources are provided for use in the pursuit of Company business and are to be reviewed, monitored, and used only in that pursuit, except as otherwise provided in this policy.

Employees are otherwise permitted to use the Company's technical resources for occasional, non-work purposes with permission from their direct Manager. Nevertheless, employees have no right of privacy as to any information or file maintained in or on the Company's property or transmitted or stored through the Company's computer, voice mail, e-mail, or telephone systems.

Unacceptable Uses: The Company's technical resources should not be used for personal gain or the advancement of individual views. Employees who wish to express personal opinions on the Internet are encouraged to obtain a personal account with a commercial Internet service provider and to access the Internet without using Company resources.

Solicitation for any non-Company business or activities using Company resources is strictly prohibited. Use of the Company's technical resources must not interfere with productivity, the productivity of any other employee, or the operation of the Company's technical resources. Employees shall not play games on the Company's computers and other technical resources.

Employees should not send e-mail or other communications that either mask their identity or indicate that someone else sent them. Employees should never access any technical resources using another employee's password. Similarly, one should only access the libraries, files, data, programs, and directories that are related to his work duties. Unauthorized review, duplication, dissemination, removal, installation, damage, or alteration of files, passwords, computer systems or programs, or other property of the Company, or improper use of information obtained by unauthorized means, is prohibited.

Sending, saving, or viewing offensive material is prohibited. Messages stored and/or transmitted by computer, voice mail, e-mail, or telephone systems must not contain content that may reasonably be considered offensive to any employee. Offensive material includes, but is not limited to, sexual comments, jokes or images, racial slurs, gender-specific comments, or any comments, jokes or images that would offend someone on the basis of his or her race, color, creed, sex, age, national origin or ancestry, physical or mental disability, or veteran status. Any use of the internet/world wide web, intranet, or electronic bulletin board to harass or discriminate is unlawful and strictly prohibited by the Company. Violators will be subject to discipline, up to and including termination.

The Company does not consider conduct in violation of this policy to be within the course and scope of employment or the direct consequence of the discharge of the employee's duties.

Accordingly, to the extent permitted by law, the Company reserves the right not to provide a defense or pay damages assessed against employees for conduct in violation of this policy.

Employees are encouraged to refer to POSH Policy and Social Media Policy.

22. ACCESS TO INFORMATION

The Company asks its employees to keep in mind that when they are using the Company's computers, they are creating Company documents using a Company asset. The Company respects the individual privacy of its employees. However, that privacy does not extend to an employee's work-related conduct or to the use of Company-provided technical resources or supplies.

Employees are responsible for the content of all text, audio, or images that they place or send over the Company's technical resources. Employees may access only files or programs, whether computerized or not, that they have permission to access.

The Company's computer, voice mail, e-mail or telephone systems and the data stored on them are and remain at all times the property of the Company. As a result, computer data, voice mail messages, e-mail messages and other data are readily available to numerous persons. If, during the course of employment, an employee performs or transmits work on the Company's computer system and other technical resources, his work may be subject to the investigation, search and review of others in accordance with this policy.

All information, including e-mail messages and files, that are created, sent, or retrieved over the Company's technical resources is the property of the Company, and should not be considered private or confidential. Employees have no right to privacy as to any information or file transmitted or stored through the Company's computer, voice mail, e-mail, or telephone systems. Any electronically stored information that an employee creates, sends to or receives from others may be retrieved and reviewed when doing so serves the legitimate business interests and obligations of the Company. Employees should also be aware that, even when a file or message is erased or a visit to an Internet or Web site is closed, it is still possible to recreate the message or locate the Web site. The Company reserves the right to monitor the employee's use of its technical resources at any time. All information including text and images may be disclosed to law enforcement or to other third parties without prior consent of the sender or the receiver.

23. COPYRIGHTED MATERIALS

Employees should not copy and/or distribute copyrighted material (e.g., software, database files, documentation, articles, graphics files, and downloaded information) through the

Company's e-mail system or by any other means unless they have confirmed in advance from appropriate sources that they have the right to copy or distribute the material. Failure to observe a copyright may result in disciplinary action by the Company as well as legal action by the copyright owner. Any questions concerning these rights should be directed to the Manager.

24. *CONFIDENTIAL INFORMATION*

E-mail and internet/web access are not entirely secure. All employees should safeguard the Company's confidential information, as well as that of clients and others, from disclosure. Messages containing confidential information should not be left visible while one is away from his/her work area.

25. *SECURITY OF INFORMATION*

Although each employee may have passwords to access computer, voice mail, and e-mail systems, these technical resources belong to the Company, are to be accessible at all times by the Company and are subject to inspections by the Company with or without notice. The Company may override any applicable passwords or codes to inspect, investigate, or search an employee's files and messages. One should not provide a password to other employees or to anyone outside the Company and should never access any technical resources using another employee's password.

In order to facilitate the Company's access to information on its technical resources, one may not encrypt or encode any voice mail or e-mail communication or any other files or data stored or exchanged on Company systems without the express prior written permission from the Manager.

26. *SOFTWARE POLICY*

Employees are prohibited from installing any software on any Company technical resource without the express prior permission from the IT Department.

Involving the IT Department ensures that the Company can manage the software on Company systems, prevent the introduction of computer viruses, and meet its obligations under any applicable software licenses and copyright laws. Computer software is protected from unauthorized copying and use by law. Unauthorized copying or use of computer software exposes the Company and the individual employee to substantial fines and exposes the individual employee to imprisonment. Therefore, employees may not load personal software

onto the Company's computer system and may not copy software from the Company's computer system for personal use.

Violations of any guidelines in this policy may result in disciplinary action up to and including termination. In addition, the Company may advise appropriate legal officials of any illegal violations.

27. *EMPLOYEE PROPERTY*

Employees should not bring valuables to work. The Company assumes no responsibility for the loss, theft, or damage of employees' personal property.

28. *VISITORS*

Employees may entertain an occasional visit from a friend or relative into the work area, provided information is given to the Manager or the HRD department. All visits must be arranged so as to minimize disruption of work. Generally, friends and relatives should be asked not to visit employees during working hours. Unattended children are not allowed in the facility or on the premises at any time. For safety and insurance reasons, friends, relatives, and clients are not permitted in areas restricted to employees only, unless authorized by the Company's management.

29. *SECURITY*

Employees should be alert at all times and should report the presence of any suspicious persons to the Manager, the HRD department, or the security guards on duty immediately. Employees should also maintain in their possession at all times their keys, security passes, and identification badge(s). Employees should not lend these items to anyone who is not authorized to possess them. Similarly, computer passwords, electronic door codes, and any other security access information should not be disclosed to anyone who is not authorized to have that information.

30. *SOLICITATION AND DISTRIBUTION OF LITERATURE*

Approaching fellow employees in the workplace regarding activities, organizations, or causes, regardless of how worthwhile, important, or benevolent, can create unnecessary apprehension and pressures for fellow employees. This conduct is inappropriate. The Company has established rules, applicable to all employees, to govern solicitation and distribution of written

material during working time and entry of persons engaged in such solicitation onto the premises and work areas. All employees are expected to comply strictly with these rules.

1. No employee shall solicit, promote or support any cause or organization during his working time or during the working time of the employee or employees at whom the activity is directed;
2. No employee shall distribute or circulate any written or printed material in work areas at any time, during his or her working time, or during the working time of the employee or employees at whom the activity is directed; and
3. Under no circumstances will non-employees be permitted to solicit or to distribute written material for any purpose on Company property.

31. BULLETIN BOARDS

Bulletin boards are reserved for the exclusive use of the Company for posting work-related notices or notices that must be posted as per law. From time to time, the Company on the bulletin boards will post special notices and information for employees. Employee postings are not permitted on the Company's bulletin boards.

32. HOUSEKEEPING

All employees are expected to maintain their desks and/or work areas in an orderly and clean fashion.

33. HEALTH AND SAFETY

The health and safety of employees and others on Company property is of critical concern to the Company. The Company strives to attain the highest possible level of safety in all activities and operations and complies with all health and safety laws applicable to its business.

To this end, the Company must rely upon employees to ensure that work areas are kept safe and free of hazardous conditions. Employees should be conscientious about workplace safety, including proper operating methods and known dangerous conditions or hazards. Employees should report any unsafe conditions or potential hazards to their Manager *immediately*, even if they believe that they have corrected the problem. If any employee suspects that a concealed danger is present on the Company's premises, or in a product, facility, piece of equipment, process, or business practice for which the Company is responsible, the same should be brought to the attention of the Manager *immediately*.

Managers should arrange for the correction of any unsafe condition or concealed danger immediately and should contact the HRD department regarding the problem.

Any workplace injury, accident, or illness *must* be reported to the Manager as soon as possible, regardless of the severity of the injury or accident. If medical attention is required immediately, employees may assist injured employees in obtaining medical care, after which the details of the injury or accident must be reported to the Manager.

Employees are encouraged to refer to Workplace Health and Safety Policy for additional details.

34. **ARBITRATION**

If any dispute or difference shall arise, the same shall be referred to arbitration of a common arbitrator if agreed upon, failing which to two arbitrators one to be appointed by the Company and the other to be appointed by the employee and the arbitration shall be governed by the Arbitration Act for the time being in force.