

EndGate Ethics(E2)



FOREWORD

EndGate Global will always maintain its core identity of remaining a truly global, unbiased and passionate organization.

EndGate Global began its operations from Toronto, Canada as EndGate Group Inc., established on November 28, 2015. Later, on September 2, 2016 EndGate Global marked its official presence in India as EndGate Technologies Private Limited. Initially founded by Rahul Kumar, Neha Rani and Kenneth Cruz- EndGate Global has always been accompanied and supported by great people, aligning with its values, from across the globe.

Initial service offering is based on the founder's expertise and included four business units: business consulting, IT solutions, business support services along with an R&D division named innovation. EndGate's intent is to offer clients a one stop solution for all their business needs.

This is the first draft of EndGate Ethics (E2) and it will lay down the values and principles to be followed by all EndGate Global organizations and its people. Its core principles shall never be changed, but amendments should be introduced from time to time to stay ahead with changing culture and regulatory compliances across various jurisdiction, where we operate.

This is a guideline on making decisions to simple as well as complex situations though this may not be a rule book of actual decisions. Whenever EndGate people feel unclear on any situation, then they must consult with chief management executives before making a final decision.

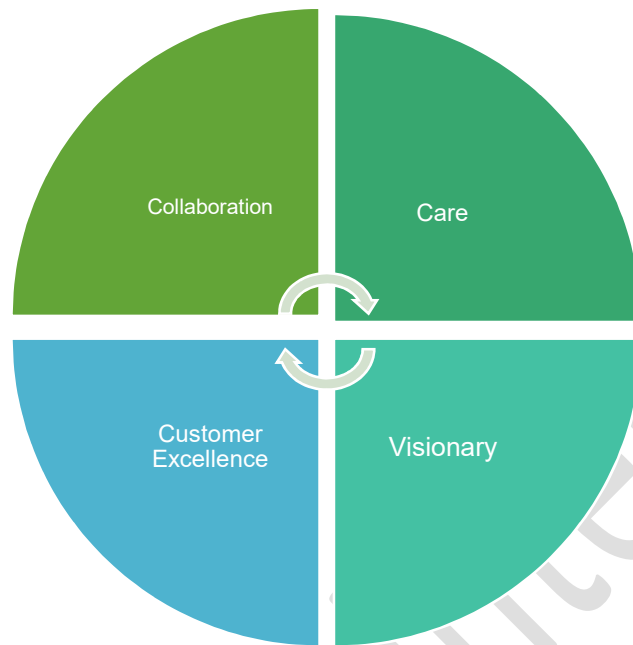
EndGate is always committed to the integrity of its people and expect professional commitment by all its people. EndGate people have capability to serve the society and create a difference. EndGate people will work towards one common goal of making EndGate a reputed global organization.

E2 in no way will interfere with or be influenced by the personal life of EndGate people. At the same time name of EndGate can't be used to create any kind of undue influence outside the organization.

CONTENTS

| | |
|--|----|
| OUR VALUES:..... | 4 |
| ENDGATE MISSION AND VALUES: | 5 |
| E2 JURISDICTION: | 6 |
| ENDGATE PRINCIPLES: | 7 |
| ENDGATE EMPLOYEES:..... | 9 |
| ENDGATE CUSTOMERS: | 15 |
| ENDGATE ENVIRONMENT & COMMUNITY: | 18 |
| ENDGATE SUPPLIERS & PARTNERS: | 20 |
| ENDGATE FINANCIAL SHAREHOLDERS: | 24 |
| ENDGATE BUSINESS, POLITICS AND GOVERNMENT: | 26 |
| ENDGATE GROUP COMPANIES: | 28 |
| ENDGATE GRIEVANCE MANAGEMENT: | 30 |
| ENDGATE ACCOUNTABILITY: | 31 |
| ACKNOWLEDGEMENT:..... | 32 |

OUR VALUES:



"If someone in this world can do, then we can do as well. We will still give a try".

- Team, EndGate Global

ENDGATE MISSION AND VALUES:

“At EndGate, we are committed to design dreams into reality”.

ENDGATE MISSION

Our mission comes from our DNA, which embodies perseverance. It defines the commitment and integrity of the actions we take and decisions we make, for our purpose, as a company.

Client's success with pride is our goal at EndGate and we, at EndGate, strive to attain and sustain "No Sorry" attitude among our workforce.

ENDGATE VALUES

Our values have been derived from where we are raised. These 4 values are 4 pillars that make working base of EndGate Global:

- **Customer Excellence:** Delivering on commitment at every stage
- **Collaboration:** Leverage co-creation of values
- **Care:** Care for people, society and business as whole
- **Visionary:** Stay focused and abreast with long term vision

E2 JURISDICTION:

E2 will be applicable for:

- EndGate People: employees and all stakeholders;
 - EndGate Partners: Business partners, join-venture partners, vendors, service providers, distributors, sales representatives, contractors, channel partners, consultants, intermediaries and agents;
 - EndGate Customers: clients;
 - EndGate Global companies;
1. Within E2, “we or us” means EndGate Global organization, its member companies and its people.
 2. E2 is our constitution, which outlines our code of conduct and sets out our expectations of all those who work with us. We expect all our customer, partners and people to be aware that E2 underpins everything we do, and to work together they need to agree and abide by it.

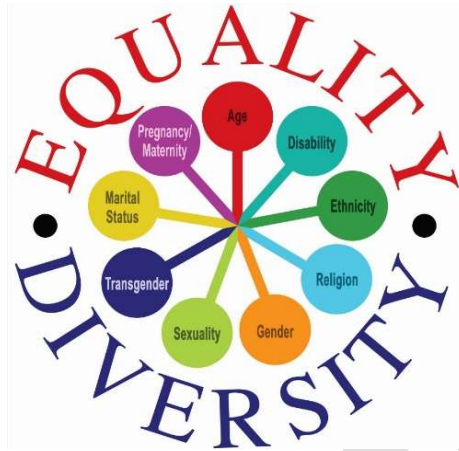
ENDGATE PRINCIPLES:

“We work hard to earn business partner’s trust and respect on every project we undertake”

1. We are people's organization where business strategies without people essence, in it, is incomplete. We are committed not only to the development of our own people but also of the community we operate in.
2. EndGate will not pay or accept bribe, in any form, whether it be for business growth, client acquisition or regulatory clearance. We will always follow a fair and standard business practice, globally. If a time comes where any such lawful or unlawful acts are considered legal in the operating geography of EndGate registered office, then such practice based on operating unit registered location shall be considered fair to business policies.
3. All activities and outcomes of EndGate operations, globally, would determine its social status and establish its brand. EndGate will never undertake any of such activities or projects, which are against social norms or ethical standard of the location in which we operate.
4. Safety, health and hygiene and environmental sustainability are key areas of focus for EndGate. Any activity under the regime of EndGate must not create a detrimental impact on any of these.
5. We must conform to highest human and moral standards when representing our company. Any decision and conduct must be considered unbiased and transparent to the highest degree of human standards.

6. We must not mistake professional life for our or our stakeholders' personal life. All decisions at every position must be unbiased, evidence based and free from any external influence.
7. We will deliver what we commit to our clients and we will commit only what we can deliver. We will never be forced by undue pressure and make inappropriate or unethical promises.
8. We shall not engage in any unfair trade practices.
9. Always any actual or perceived violation of code by clients or our people must be reported, anonymously, in good faith and any confirmation shall only be made after unbiased verification by an independent and non-related team of people.
10. Our leaders will exhibit behavior of leading growth of EndGate people and encourage fair practices through following ethical standards as set out in E2.
11. We will always follow laws and regulatory compliance as laid out by local government agency based on our operational geography.

ENDGATE EMPLOYEES:



We take care of our employees, because they take care of EndGate family.

“Our employees come first. And if we treat our employee’s right, and then guess what? Our customers come back, and that makes our shareholders happy. Start with employees and rest will follow from there”.

1. Equality

Anyone working at EndGate Global, from senior most management position to entry level will be considered as employee of the company and all the codes under E2 remains same for every employee of EndGate Global.

2. Equal Opportunity Employer

We are based on the principle of Equal Opportunity. No person shall be subjected to any discrimination in any aspect of the employment, including recruitment, compensation, benefits, promotion, work assignments, access to training, advancement, discipline, termination or retirement, based on race, religious belief, color, gender, physical or medical conditions, age, nationality, ancestry, sexual orientation, caste, political opinion, union affiliation, ethnic group or referrals. Our employees will receive equal opportunity to learn, grow and prosper.

3. Data Privacy

Other than for legal and statistical purpose we will never collect data on religion, race, gender or cast prior to hiring process.

4. Learning and Development

Special consideration and access to resources shall be provided to employees willing to gain relevant education and grow.

5. Employee's Respect, Human Rights and labor laws

We respect human right of all our employees and every employee is encouraged to treat their colleagues, at work, with respect. No harassment shall be tolerated whether physical, sexual, verbal or psychological. We don't employ minors at our workplace, other than for training and internships.

6. Zero Tolerance on Sexual Abuse

EndGate expects all its employees, as well as customers, not to involve in any activity, whether it be verbal, physical or behavioral that directly or indirectly relates to sexism or violation to dignity or equality of any individual.



7. Separation between Professional and Personal Life

There will be a clear demarcation between personal and professional life. EndGate will never interfere or be influenced by an employee's personal life, unless it interferes with EndGate's business interest.

8. Corruption

We will never take any payment to offer an employment with us, or to work with us. EndGate employees and any of its direct or indirect representative shall never pay or receive any bribery, in the form of cash, asset or any other benefits, that are intended or perceived to obtain undue favor for our business.

9. Exchange of Gifts

Any exchange of gifts, in any form, between our people, directly or indirectly employed by us, shall be in accordance with the management approval and/or internal policy.

These gifts must not influence the decision of any outsider or insider, to the company. Such gifts must pass via management for ethical evaluation and approval. Direct exchange of expensive gifts, whether in form of currency or article, between client and employee is against the norms of E2.

10. Confidentiality and Data Security

Under no circumstance the confidential data of EndGate or its client/vendors shall be shared with competition or any outsider. Loss or theft of such data must be immediately reported to Human Resources team of EndGate. All documents must be secured based on below categories:

Any document marked “EndGate Confidential” shall not be shared with any one inside or outside the organization without prior management approval.

Any document marked “EndGate Internal” shall not be shared with anyone outside the organization without prior management approval.



11. Public Communication and Disclosure

Any of our employees whether on management position or general position shall not disclose any confidential data or information including financials, IPRs, next steps or any other business related information. Loss or theft of such data must be immediately reported to Human Resources team of EndGate.

12. Appropriate Utilization of Asset

Any asset, whether property, electronics or resources, shall only be used for the assigned purpose for which they are provided. We shall do regular checks to avoid asset misuse.

13. Illegal Acts

Any illegal act, including possession of illegal substance, shall not be tolerated at work place.

14. Insider Trading

Any undisclosed and confidential information, related to EndGate or any of its stakeholders, shall not be passed to any outsider including family members, friends or any third person for any reason.

15. Conflict of Interest

Any employee of EndGate shall not share any publicly unavailable data or information to any third person or engage in any conflicting business activity. Any association or activity, of EndGate employees, that may potentially cause conflict of interest must be executed only after prior approval from Human Resources team of EndGate. Failure to make prior declaration of potential conflict of interest shall result in disciplinary action whenever it becomes known in future.

16. Performance with Work-Life Balance

At EndGate, it's also about performance and delivery alongside amazing work-life balance. All people, at EndGate, join with a promise of delivering on their commitment, to keep our flag of performance up and never be in a situation of professional disgrace. EndGate reserves its right to dismissal on the grounds of non-performance or professional disgrace.

ENDGATE CUSTOMERS:



“EndGate is an end to end business solution provider”

Code of conduct for customer is a very important component of E2. At EndGate, we take utmost care in selecting any customer. A customer can be defined as any individual, group of individuals or entity that avails EndGate's services bonded by a legal document, like contract, MoU or any other type of signed or communicated agreement.

1. Honesty and transparency

Ethics in customer dealings presents us in a good light. Winning customers' trust through honesty in our communication and transparency in our customer dealing is our top most priority. We believe in transparency within our communication to customers.

2. Promotions and advertisements fairness

Our advertised products and services are true as advertised and presented under EndGate website and official documents. We do what we say and we say what we do.

3. Dealing with customers

We shall always deal with our customers in a professional manner and always keep it fair and transparent between EndGate and its customers. We shall always protect customers' personal data in accordance with applicable law.

4. Fair competition

We support competition, but in a fair way, and we shall never encourage or entertain any anti-competitive behaviors, such as abuse of market dominance, collusion, participation in cartels or inappropriate disclosure of information with competitors, where the interests of public, at large, is compromised. Any information or market data, collected in course of servicing clients, shall not be used for gaining unfair advantage or any kind of anti-competition activity

5. Fair and honest relationship between our employees and our customers

We encourage conducive environment and hence strong bonding between our employees and our customers. Under no circumstances shall an employee be asked to perform a job or an act that's

beyond the scope of working contract. Also, we shall encourage our employees to keep the information and any kinds of communication transparent between EndGate and its customers.

6. Giving or accepting gifts

We ensure adequate compensation to our employees and time to time the performance review and compensation review is done to pay our employees on par with industry and country norms. It is important that no gifts or promotional items or cash shall be exchanged directly between our customers and our people. Any such gifts can only be given post prior approval and through proper channel of EndGate. Any exchange of gifts shall neither be intended nor likely to be perceived as an attempt to influence any sort of business decisions.

Note: Our people shall not accept any gift from a customer and politely refuse by explaining EndGate Ethics (E2) policy on accepting gifts. Ask our Human Resources department for help if you are unsure about offering or accepting a gift.

ENDGATE ENVIRONMENT & COMMUNITY:



“Nature provides a free lunch, but only if we control our appetites”

“We value our Nature. Some say, we DO”

People and The Community

We care for people as well as environment where we operate. We encourage our people to volunteer for projects that will benefit the communities. We actively assist in the improvement of the quality of life of the people in the communities in which we live and work.

Our Goal

We engage with companies and Delegates to minimize the adverse effect on the community and the environment. The goal of which is to achieve balance/harmony between environment sustainability, economic sustainability and socio-political sustainability.

1. To Prevent wasteful use of Natural Resources

We are working to lower our greenhouse gas (GHG) impact and carbon footprint in our day to day activities. We are also committed for power consumption, consumption of water and energy wherever feasible. Proper management of harmful and hazardous wastes are on the top in our Company.

2. Promoting Smart Programs

Our Smart Work program promotes flexible work options and our collaborative technologies are helping us reduce the environmental impacts and costs associated with business operations and travel.

Note: We encourage all suppliers and their employees to get involved in local social and environmental community charity efforts by volunteering time and/or providing other types of support.

ENDGATE SUPPLIERS & PARTNERS:



"Our attitude to any assignment is "If someone can do it, then we as well can do it, if no one can do it we will still try for it".

Our suppliers play integral role in our service and product offerings. They equally contribute to our position and ethical values. All our suppliers and partners are expected to comply with and will be monitored for our ethical parameters.

1. Value Alignment

We carefully chose all our suppliers and ensure that they demonstrate the same values as we do. Time to time we review our suppliers and partners, on our value parameters and make amendments as and where required.

2. Sustainability

We choose suppliers who adhere to environmental policies and standards and comply with all applicable local laws, and agree to be monitored separately for environmental responsibility.

3. Selection and Contract Terms

Supplier and partner selection must be transparent, truly based on merit and free from any bias. Any step taken or planned for future must be in-line with terms defined under initial contract between EndGate and value chain partner. Any step beyond the terms of contracts shall be executed only after prior approval from EndGate.

4. Confidentiality of Intellectual Property

We respect confidentiality of data shared and obligations on the use of third party intellectual property. All our suppliers and partners are expected to abide by protecting our data and intellectual property in course of their outside communication and day to day business operations.

5. Exchange of Gifts

Any exchange of gifts should be in accordance with EndGate ethics and it should not influence business decisions or operating procedures.

6. Law

We expect our suppliers and partners to follow relevant and applicable laws and regulations of the country in which workers are employed including those at the federal, state/provincial and local community levels.



3. Zero Tolerance on Child Labor

None of our suppliers and/or partners shall employ anyone under the legal age of applicable employment as defined by local labor laws. Juvenile workers (ages 15-17) shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to compromise their health, safety or morals.

4. Forced Labor

There shall be no use of forced labor, including prison, indentured, bonded, slave or other forms of forced labor.

5. Harassment, Abuse and Anti-Disciplinary Practices

No employee shall be subjected to any physical, sexual, psychological or verbal harassment or abuse or to monetary fines or embarrassing acts as a disciplinary measure. Acts of human trafficking are strongly condemned.



Note: Every human being must be treated with respect and dignity. One should not encourage illegal and unethical practices. Partners and suppliers shall adopt and adhere to rules and conditions of employment that respect workers and, minimum, safeguard their rights under national and international labor and social security laws and regulations

ENDGATE FINANCIAL SHAREHOLDERS:



“We have a unique way to evaluate our parameters that are productivity ratios, profit ratios, debt ratios, efficiency ratios and price ratios”

1. Value Creation

We are committed to creating value for all our financial shareholders without compromising our values and business ethics.

2. Transparency and Communication

Relevant information, about business and operations, must be disclosed and timely communicated to all our shareholders in accordance with applicable law and agreements.

3. Zero Influence on Business Decisions

Financial component is the underlying component of all our business decisions, but our business decisions shall not be influenced only by our financial shareholders. Under no circumstance the values and vision of EndGate shall be compromised on the grounds of financial outcomes.

ENDGATE BUSINESS, POLITICS AND GOVERNMENT:



“A balanced relationship between the government and businesses is required for the welfare of the economy and the nation”

1. Collaboration

We shall collaborate with government for suggesting and supporting change, in a constructive manner, for the betterment of economy and society.

2. Understanding of Laws

EndGate employees who deal with any governmental agency, including international organizations, are responsible for learning and complying with all rules that apply to government contracting and interactions with government officials and employees.

3. Zero Influence

We will always work in accordance with local regulations and constitution. We will never try to influence or be influenced, within our business operations, by political system of the geography we operate in.

4. No Exchange of Gift

We will not give costly gift whether in form of an article, asset, donation or currency to any of the political or government bodies.

5. Zero Corruption and Bribe

We strive to zero-down corruption, inside as well as outside the company, in our day to day business dealing. We will never encourage bribe, in any form, for business acquisition and/or growth.

ENDGATE GROUP COMPANIES:



“We are working as a single but independent economic entity through decentralized but same value based system”.

1. Sharing and Caring

We will share resources with our group companies and always care for the growth of each other. We shall design best practices on global level and support implementation based on the expertise of the appropriate group companies.

2. E2 and Local Laws

All group companies shall follow E2 if it's not over-powered by local regulations of operating geography. Local laws must be respected and followed for adherence with the socio-political norms and for the good of society we operate in.

3. Dispute Resolution

Any dispute between our group companies shall not interfere with our business as usual activities. It must be resolved by selected members, as a part of dispute resolution team, from non-involved group companies in a transparent and unbiased manner.

ENDGATE GRIEVANCE MANAGEMENT:

1. Reporting Issues

Any issue suspected, whether by people of EndGate, customer or any third-party vendor or partner shall be reported immediately to their Human Resource contact person. If issue is not, satisfactorily, acted upon by the HR contact person or if one is subjected to retaliation for reporting the issue then the issue should be actively reported to group head/Director/CEO.

2. Formal Course of Grievance Management

Any grievance shall be thoroughly analyzed, studied and resolved in a most unbiased manner. Any internal grievance or issue must be, first, reported and acted upon by internal team before it must be taken to legal system of the required jurisdiction.

ENDGATE ACCOUNTABILITY:

EndGate Ethics (E2) is set of principles covering majority, if not all, of functional and operational areas. It defines our commitment to better and ethical business policies.

All the people involved throughout the value chain of EndGate Global organization are expected to always abide by norms of E2. Any violation to these principles, by anyone who is directly or indirectly employed by us including employee, customers, partners, vendors, shall result in disciplinary investigation followed by termination from the company, in case if at fault, with immediate effect.

E2 is the identity of EndGate and it defines every action of people associated with EndGate. E2 outlines our values, responsibilities and commitment to all stakeholders including community, employees, customers, vendors, partners, regulatory bodies, government and shareholders.

ACKNOWLEDGEMENT:

I, _____,
acknowledge that I have received the EndGate Ethics (E2). I have read the EndGate Ethics and I
acknowledge that as a part of EndGate, I am required to comply with the guidelines described
therein and failure to do so may subject me to disciplinary action as well as termination.

I will be declaring E2 violations and conflict of interest, if any, I have made in past during my
employment term at EndGate. If ever a violation, from past, is identified that is not outlined here,
then I shall be subjected to disciplinary action and even termination as per E2. If I have a
concern about a violation, or a potential violation of the E2, I understand that there are channels
available to me in my company to report such concerns. I will be accountable for all my actions
and behavior. I commit to maintaining to highest level of standard as outlined in E2.

Declaration of Conflict of Interest with EndGate based on previous life

Declaration of Past E2 Violations at EndGate:

Name: _____

Email ID: _____

Group Company, Location: _____

Department: _____

Signature: _____ Date: _____

Permanent Address:

(Please return this declaration to your Human Resource department in person or by post)

THANK YOU