
CODE OF CONDUCT AND ETHICS POLICY

1. Purpose

The purpose of this Code of Conduct and Ethics (“Code”) is to establish clear behavioral expectations for all representatives of TechnoSphere India Private Limited (“the Company”). The Code aims to uphold honesty, respect, confidentiality, compliance with laws, professionalism, and integrity in all business dealings to foster a positive, ethical workplace culture.

2. Scope

This Code applies to all employees, contractors, consultants, executives, officers, and members of the Board of Directors of TechnoSphere India Private Limited, collectively referred to as “Company Representatives.” It covers conduct during business operations, company-related events, and any other context where representatives act on behalf of the Company.

3. Core Principles & Behavioral Expectations

- **Honesty and Integrity:** Company Representatives shall conduct all activities honestly, transparently, and with the highest ethical standards.
- **Respect and Fair Treatment:** Treat all colleagues, clients, vendors, and stakeholders with dignity, respect, and fairness, promoting a workplace free from discrimination, harassment, and bullying.
- **Confidentiality:** Protect Company confidential information, trade secrets, and personal data of employees and clients. Do not disclose sensitive information without authorization.
- **Compliance:** Adhere to all applicable laws, regulations, policies, and contractual obligations, including anti-corruption, health & safety, and labor laws.
- **Professionalism:** Maintain appropriate behavior, appearance, and communication, exhibiting reliability and accountability in fulfilling duties.

- **Conflict of Interest:** Disclose any actual or potential conflict of interest that might influence business decisions or integrity. Avoid engaging in activities that conflict with the Company's interests.
 - **Use of Company Assets:** Utilize Company resources responsibly and solely for authorized business purposes.
 - **Reporting Violations:** Promptly report any suspected violations of this Code or other unethical behavior through designated reporting channels, without fear of retaliation.
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4. Conflict of Interest

- Company Representatives must avoid situations where personal interests conflict or appear to conflict with Company interests.
 - All conflicts must be disclosed to one's supervisor or the Compliance Officer proactively.
 - Gifts, hospitality, or benefits must be reasonable, transparent, and not intended to influence business decisions.
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5. Reporting Mechanisms

- The Company provides multiple confidential channels for reporting ethical concerns or violations, including direct supervisors, Human Resources, Compliance Officer, or the Whistleblower system.
 - Reports will be investigated fairly and promptly, maintaining confidentiality and protecting whistleblowers from retaliation.
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6. Disciplinary Action

- Violations of this Code may result in disciplinary action, which may include reprimand, suspension, termination of employment, or legal action depending on the severity of the breach.
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7. Training and Communication

- Regular training sessions will be conducted to ensure that all employees and affiliates understand and adhere to this Code.

TECHNOSPHERE INDIA PRIVATE LIMITED

Registered Address: Hinjewadi, Phase2, Pune, Maharashtra, India

CIN: CIN123456789

- Updates to the Code will be communicated promptly to all Company Representatives.

8. Review of Code

This Code shall be reviewed annually by the Compliance Committee and updated as necessary to reflect legal requirements, ethical standards, and organizational values.

Approved by: Board of Directors

Effective Date: Jan 2025

Review Date: Jan 2025