



Dear- \_\_\_\_\_

### **POLICY PURPOSE**

Our Employee Code Of Conduct company policy outlines company expectations regarding employees behavior towards their colleagues, superiors and overall organization.

We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful & collaborative environment.

### **What's Code Of Conduct-**

Code of conduct is a statement of our shared values that helps us operate openly, honestly and ethically. Our code of conduct is a brief of our guide as to win in business with integrity. Though it doesn't offer an answer to every situation, it provides the resources you need to make ethical decisions. Refer to it often in your work, use a good judgment and always seek guidance if you need additional assistance.

### **Scope-**

This policy and code of conduct applies to everyone in our company at every level, including employees, supervisors, managers, top management.

### **Accountability-**

We are each personally responsible for operating with high performance, honesty, integrity. We own accountability at our personal level, which means

- What we say we will do.
- Demonstrating accountability by supporting each other's work by being transparent, honest and direct.
- Demonstrating performance based behavior by proactively seeking solution to problems.
- Demonstrating accountability by aligning performance based behavior with our company objectives.

## **DIRECTOR's MESSAGE**

Our code of conduct sets forth our fundamental commitment to conducting business ethically & honestly. We are committed to our core values integrity, honesty, high performance and customer satisfaction. We must always act with integrity, take accountability for results and to do right thing even when right thing is hard to do. Quality and Safety for both customer and workplace are fundamental commitments, which cannot be compromised.

Taking personal responsibility for our actions is critical to our success and the senior leadership team and I urge all to take time to understand and then live the code. It is important to know the policies and guidelines you are required to follow and use them as a guide when making decisions that affect you & the company.

I look forward to working with you to make our company the best it can be.

**KARTIK DAFTARI**

## **HR POLICY**

We believe that HR Policies and interventions have the inherent responsibility of organizational transformation and effective change management through progressive adoption of techniques and structures that accord precedence to action oriented goals and continuous resource development. It is with this goal in perspective that our Human Resource policies focus on key areas like talent acquisition and retention, training and development, compensation management and social security.

The company hires the best available talent in various disciplines through a rigorous selection process. It also visits the campuses of leading educational institutions to head hunt the critical talent based on its requirements.

The company HR leadership believes that in order to sustain its edge, it needs to win the hunt of talent continuously as it cannot afford to lose its rare talent pool to competition. Accordingly, various measures pertaining to compensation and welfare of employees are undertaken and the same are revised / modified periodically according to changing circumstances and requirements. It is needless to mention that all statutory benefits are duly provided.

Social security is another area that HR policies emphasize on a continuous basis. We have policies in place that ensure the social security benefits. Some of the prominent measures in this respect are medical facilities to employees.

Sincere efforts are made to meet the aspirations by adopting best in class HR practices. Various benchmarks studies pertaining to employee satisfaction, motivation, organizational culture and climate are periodically conducted by in-house expertise as well as by external agencies in order to introspect and understand the pulse of the employees and take corrective measures.

## **CODE OF CONDUCT FOR EMPLOYEES**

1. General Standards of Conduct
2. Equal Opportunities for All
3. Prevention of child labor
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5. Female workers (pregnant/nursing mothers)
6. Enabling Work Environment
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10. Compliance
11. Handling Confidential Information
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13. Relations with Customers
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## **CODE OF CONDUCT FOR EMPLOYEES**

The Code of Conduct is an elaboration of Conduct and Action and sets out what is expected of the Group's employees. The objective of this Code is to ensure that every employee of the organization is aware of acceptable conduct and ethical behavior.

### **1. General Standards of Conduct**

We expect all our employees to conduct their business dealings honestly, openly, fairly, diligently and courteously and in a manner that enhances the image of the Group/ Company. All employees should be aware of all policies and procedures applicable to the Group/ their Company and abide by them to the fullest extent. While policies and procedures could be questioned, it should happen through appropriate forums responsible for review of policies and until any such change happens, no person should violate the existing policy / procedure.

### **2. Equal Opportunities for All**

Unless local laws or regulations require us to do otherwise, we will recruit people solely on merit and reward people on the basis of their performance and potential without discrimination on grounds of age, race, caste, ethnic origin, religion, political or other opinion, gender, sexual orientation, marital, status, or disability/disease unrelated to the role. No employee of the Company will discriminate between others based on any of the above grounds or on the basis of any other personal prejudices or biases.

### **3. Prevention of child labour**

We observe by the United Nations Convention on the Rights of the Child (1989), and comply with all relevant national and international laws, regulations and provisions applicable in their country of production or operations.

We have maintained record / documentation to legally prove the date of birth for all our workers. A Labour force register carrying all such records is maintained.

Clarifications:

- Child labour is defined as work performed by children, which interferes with a child's right to healthy growth and development and denies him or her the right to quality education.

### **4. Forced and bonded labour**

Clarifications:

- Forced labour is understood as all work or service that a person is compelled to carry out under any threat of punishment or confiscation of any personal belongings, such as ID card, passport etc., and for which work the person has not offered him/herself voluntarily
- Bonded labour is understood as labour not only physically bonded, but also bonded by financial debts, loans or deposits.

We strictly examine

- Not employing - any prison workers, any military personnel employed as part of their active service.
- Not require any deposits. • Not withhold wages, ID cards, passports, or other personal belongings.
- Not delay payments of workers' salary more than one month on a regular basis.

We allow our workers to freely leave the factory premises when their work shifts end

- If employment contracts are terminated according to agreed notice time, we will not make any salary deductions for workers who leave.
- If temporary labour is employed on a contractual basis, such workers shall never be required to remain employed against their own will, for any period beyond the agreed time of the contract.
- We observe loans to workers shall not exceed the amount of three month's salary.

We do not discriminate with regards to workers based on race, religion, beliefs, gender, marital or maternal status, age, political affiliation, national origin, disability, sexual orientation or any other basis.

Freedom of Association:

We always ensure that workers are not prevented from associating freely.

We never prevent workers from exercising collective bargaining activities.

Harassment, Abuse and Disciplinary Actions:

We do not engage in or support the use of corporal punishment, threats of violence or other forms of mental or physical coercion. We also practice not make use of public warning and punishment systems.

Harassment and Abuse:

We do not engage, support or allow any form of harassment or abuse at the workplace.

**We practice guidelines framed under Global standards**

The Universal Declaration of Human Rights (UN 1948)

Convention on the Rights of the Child (UN 1989).

Minimum Age Convention and Worst Forms of Child Labour Conventions (ILO Conventions 138 and 182).

Fundamental Principles and Rights at Work (ILO 1998).

Forced Labour Convention and Abolition of Forced Labour Conventions (ILO Conventions 29 and 105)

Equal Remuneration Convention and Discrimination (Employment and Occupation) Convention (ILO Conventions 100 and 111).

Freedom of Association and Protection of the Right to Organize, Right to Organize and Collective Bargain Convention (ILO Conventions 87 and 98).

The **Child Labour** (Prohibition and Regulation) **Act, 1986** is one the most debated **acts** regarding children in **India**. The Act prohibits the employment of children below the age of 14 years in hazardous occupations identified in a list by the law. The list was expanded in 2006, and again in 2008.

**THE CHILD LABOUR (PROHIBITION AND REGULATION) RULES, 1988**  
**The Factories Act of 1948:** The Act prohibits the employment of children below the age of 14 years in any factory. The law also placed rules on who, when and how long can pre-adults aged 15–18 years be employed in any factory.

## **5. Female workers (pregnant/nursing mothers)**

We are comply the provisions prescribed under MATERNITY BENEFIT ACT, 1961

**We endow with** Cash Benefits and Privileges

- Leave with average pay for six weeks before the delivery
- Leave with average pay for six weeks after the delivery
- A medical bonus if the employer does not provide free medical care to the woman
- An additional leave with pay up to one month if the woman shows proof of illness due to the pregnancy, delivery, miscarriage or premature birth
- In case of miscarriage, six weeks leave with average pay from the date of miscarriage.
- Light work for ten weeks (six weeks plus one month) before the date of her expected delivery, if she asks for it
- Two nursing breaks in the course of her daily work until the child is 15 months old
- No discharge or dismissal while she is on maternity leave

## **6. Enabling Work Environment**

The Company respects the rights and dignity of all employees. We aim to establish clear values and objectives so that all employees understand and are committed to the aims of the Group and clearly see their roles within it. We will seek to create a challenging environment of empowerment and continuous learning, to recognize individual and team contributions, and to reward competitively, relative to performance.

It is expected that all employees in the Company treat the people they interact with, both within and outside the Company, with respect and in a manner that their self esteem and dignity are maintained at all times

All employees will work together in a collaborative manner as a well-knit team towards the achievement of business goals, putting the interests of the team and the Group/Company before their own. They will work in a manner that is open, honest, straightforward and fair, respectful of the roles and views of others and actively listening and dialoguing with team-mates. Employees will freely share required Information with each other, learn from each other, help one another to develop and grow, and contribute towards making the experience of working for organization an enjoyable one for every member of the Hi-Tech family.

The Group is committed to provide a work environment free of unlawful harassment. Sexual harassment and harassment based on age, race, religion, caste, ethnic origin, disability unrelated to the role, marital status, sexual orientation, pregnancy/ childbirth, or any other is prohibited. No employee will indulge in or condone harassment of any kind. Our policy on sexual harassment spells out further details on this particular type of harassment.

### **7. Conflict of Interest**

The term “conflict of interest” describes any circumstances that could cast doubt on our ability to act with total objectivity with regard to the Group’s/ Company’s interests.

a) No employee will be involved in any arrangement or circumstances, including family or other personal relationships, which might discourage him/her from acting in the best interest of the Group/Company.

b) No employee or his/her family member will act as a broker or on behalf of a third party in transactions involving or potentially involving his/her company.

c) Employees or their family members will not have any financial interest in any outside enterprise which is currently doing business or seeks to do business with or is a competitor of his/her Company. If the employee comes to know that his/her Company is doing business with any organization/ individual with which he/she is directly or indirectly involved – for example, through a relative – he/she is obliged to bring it to the notice of his Department Head or Head-HR through a written letter/ mail.

d) An employee should not be the final decision maker for any business contract or arrangement with any organization wherein his/her relatives/ close friends are employed in key positions. In the event an employee finds himself / herself in a position of having to decide on such a contract or arrangement, he/she should refrain from taking such a decision and refer the matter to his/her superior for taking a decision, clearly informing his/her superior of his/her relationship with key personnel in the concerned organization.

e) It is obligatory for an employee to declare that he/she is related to any other employee of the Group/Company as soon as he/she discovers it, through a written letter/ mail to the Head – HR.

f) Employees shall not exploit for their own personal gain opportunities that are discovered through the use of corporate property, information or position.

g) No employee shall solicit or promote any personal / public cause or organization/ association during working hours.

h) Employee involved in illegal trades, malpractices, personal conflicts, will not be entertained. Company is not responsible for any employee’s personal conflicts.

As a general rule, when in doubt, ask your Manager or the Head of Finance/HR.



## **8. Payments, Gifts & Entertainment**

a) The Company will not make any contribution of company funds, property or services to a political party or religious organization, or to a candidate for or holder of any Government office.

b) No employee will offer any gifts, favors or entertainment to others that are:

- not consistent with customary business practice.
- Excessive in value and / or could be construed as a bribe or pay-off.
- In violation of applicable laws or ethical standards.
- Such that public disclosure could embarrass the Group/Company or oneself.

c) Employees should get the prior approval of the Business / Functional Head to incur any expenses towards entertainment. Business / Functional Heads are responsible to monitor the incurred entertainment expense patterns of their employees to ensure that the amount is used judiciously. All expenditure which does not have the necessary documentation, bills, etc. will not be reimbursed. Entertainment expenditure on alcoholic drinks will be permitted only with the specific approval of the Business Head/ Functional Head.

d) Employees should not as a principle, accept gifts in kind or cash or enjoy any special privileges from any business associate. Complimentary / sweets may be accepted only on festive occasions/new year/special anniversaries, if it serves the purpose of maintaining proper and good relationship with our regular business associates; however, the value of such complimentary should not exceed Rs. 500/-. Moreover it is preferable that sweets etc. if accepted on festive occasions are received only at the place of work and shared with colleagues. Employees should not accept offers to be entertained by an individual or organizations with whom his/her Company transacts business. Invitations to occasional lunches/dinners hosted by our business associates may be accepted, if it serves the purpose of enhancing the relationship, after informing the immediate superior. It is essential that in the event of an employee accepting complimentary (up to value specified) or attending an occasional lunch/dinner, there should be no scope for this being construed as having influenced the judgment of the recipient.

e) Employees will be reimbursed outstation travel/ local conveyance expenses incurred on account of official work as per policy of his/her Company. Employees should claim only expenses actually incurred and should not inflate/falsify expense claims even if these are within the prescribed limits for the individual. Under no circumstances shall personal expenses be reimbursed by the company.

## **9. Usage of Company's Assets**

Protecting the Company's assets is a key responsibility of every employee. Care should be taken to ensure that assets are not misused, misappropriated, loaned to others, or sold or donated or mortgaged, without appropriate authorization. Employees may not use Group/Company assets for personal use, nor may they allow any other person to use Group/Company assets.

Every employee is personally responsible for all Company funds over which he or she exercises control. Company funds must be used only for business purposes. Every employee must take reasonable steps to ensure that the Company receives good value for Company funds spent and must maintain accurate and timely record of expenditure.

## **10. Compliance**

It is the Group's policy to comply fully in letter and in spirit with all applicable laws, rules and regulations. In case of ambiguity of the laws or their interpretation, legal advice should be sought.

All required information shall be made accessible to the Company's auditors and other authorized persons and government agencies. False or misleading entries, unrecorded funds or assets, or payments without appropriate supporting documentation and approval are strictly prohibited and violate Company policy and the Law. There shall be no wilful omissions of any company transactions from the books and records, no advance income recognition and no hidden bank accounts and funds. No employee in any way will cause the company's accounts or other records to not clearly describe and properly state the true nature and timing of a business activity or transaction.

## **11. Handling Confidential Information**

a. Employees should use information received in the course of their business dealings only for the purpose it is intended or normally used and never for personal gain or for a third party's gain. They should also not release confidential data or information to others without proper authorization.

b. The Group/Company has many kinds of business relationships with many companies and individuals. All employees should take special care to handle confidential information of our customers, potential customers, suppliers, potential suppliers or any other third party with responsibility.

## **12. Procurement Practices**

The Company's policy is to purchase supplies based on need, quality, service, price and terms and conditions. Suppliers should be selected based on merit, price, quality and performance. The Group's policy is to, as a rule, select significant suppliers or enter into significant supplier agreements through a competitive bid process. Under no circumstances should any Group/Company employee, agent or contractor attempt to coerce suppliers in any way. All supplier agreements must be reviewed after a 3 year period and fresh bids invited to confirm the competitiveness of the existing supplier agreement.

Supplies may be purchased from our customers when a combination of quality, price, services offered and reliability of supply warrant such purchases. In addition the "Purchasers' Charter" of our Company must be adhered to.

## **13. Relations with Customers**

The Group recognize that our customers are of paramount importance and the Group will prosper only to the extent that we meet and exceed the needs of our customers.

All employees will at all times :

a) Recommend to customers, products that are most appropriate for their needs from the Group's/Company's range of the products.

b) Ensure that products supplied to customers are as per the stated quantity and specifications.

c) Endeavour to meet delivery commitments to customers and inform customers well in advance in the event of inability to meet delivery commitments for unavoidable reasons.

d) Promptly respond to all queries from customers.

e) Handle all customer complaints promptly and fairly.

#### **14. Free and Fair Competition**

Employees of the Group may not, knowingly, make false or misleading statements regarding its competitors or the products of its competitors, customers or suppliers. Participating with competitors in a trade association or in a standards creation body is acceptable when the association has been properly established, has a legitimate purpose, and has limited its activities to that purpose.

No employee shall at any time or under any circumstances enter into an agreement or understanding, with any competitor concerning prices, discounts, other terms or conditions of sale, profits or profit margins, costs, allocation of product or geographic markets, allocation of customers, limitations on production, boycotts of customers or suppliers, or bids or the intent to bid.

Group employees may not unlawfully use the information, material, products, intellectual property, or proprietary or confidential information of anyone including suppliers, customers, and business partners. Employees should never attempt to obtain a competitor's confidential information by improper means.