

Accelya India Code of Conduct

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1. Objective

Code of Conduct Policy applies globally to all employee, consultant, trainee and insource staff working with Accelya Solutions India Limited & Accelya Services India Private Limited and its subsidiaries (hereinafter collectively referred to as “Accelya India” or “the Company”) to ensure integrity and consistency in corporate values and behavior and at the same time, respect the local customs and traditions.

The primary objective of the policy is providing a set of acceptable behavior and practices for employees, consultants, trainees and insource staffs working while interacting within Accelya India or while interacting with customers, vendors and third parties.

This policy is in line with the principles underlined in the UN Global Compact. The United Nations Global Compact is a United Nations initiative to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labour, the environment and anti-corruption.

2. Act in the Best Interests of Accelya India and Avoid Conflicts of Interest

2.1 Complying with Legal Requirements

Employees / consultants / trainees and insource staffs:

- a. Will undertake and conduct the business of Accelya India as responsible corporate citizens and will act in accordance with the applicable law in letter and in spirit.
- b. Will follow and adhere to all Rules, Regulations, Policies and Code of Conduct of Accelya India.
- c. Will follow the licensing and internal procedures and authorization obligations as applicable from time to time.
- d. will take a common approach on matters that impact more than one location of Accelya India, since the business of Accelya India is spread over multiple locations.
- e. agrees that any unlawful means of whatever nature to overcome difficulties in the operation or implementation of legislation is expressly prohibited and discouraged

2.2 Competing Fairly

Employees / consultants / trainees and insource staffs:

- a. Commits to legal and ethical competition.
- b. will use the resources, knowledge and expertise to the competitive advantage of Accelya India with due respect and will respect the rights of others to carry on their business.

- c. will avoid undue pressure/undue influence on customers in ways that may reduce or remove their ability to choose between services of competitors.
- d. will respect competitors' rights and proprietary information.
- e. will ensure that the information memoranda are not misleading while highlighting our competitive strengths.
- f. will support the development of laws that promote, encourage or result in fair competition.

2.3 Acting with Integrity

Employees / consultants / trainees and insource staffs:

- a. will be committed in maintaining the highest standards of integrity and ethics in every sphere of activity and will abide by the rules and regulations of Accelya India.
- b. will protect and nurture the Company's interests at all times and will avoid or declare any conflict of interest that may lead to addressing of personal interest or concerns and seen as lack of corporate loyalties. A conflict of interest also includes conflict of interest between the Company's interest and interests within and outside the Company. Merely as examples, without in any way limiting the meaning of conflict of interest, given below are some examples on conflict of interest:-
 - i. where a large shareholding in a competing organization, or participates in the business and management of another organization in any manner, or spends work time on other things, or acting as a supplier or competitor to Accelya India.
 - ii. will disclose any interest – personal, professional academic or business – which may arise directly or indirectly through their relatives, which may conflict with their responsibilities.
 - iii. will avoid any form of activity that has the potential to give rise to a conflict of interest situation such that the ability of the employee to perform objectively or impartially could get impaired.
 - iv. will ensure that all procurements or contracts with third party will be routed through the Procurement Department of Accelya India.
 - v. will discuss with supervisor in the event of any doubt pertaining to conflict, discuss to agree on the way forward.
- c. will not offer or accept gifts, hospitality or other inducements, which can influence a decision, or engage in any form of bribery and will report if any such incident occurs or is witnessed.

- d. will ensure that in keeping with Accelya India policy of not espousing the payments or receipt of gifts or bribes for business or financial gain, will not do anything that could give an impression that Accelya India could be influenced in this manner through gifts/bribes.
- e. will not indulge in any money laundering activities.
- f. will not indulge in any insider trading activities. The Code of Conduct pursuant to SEBI (Prohibition of Insider Trading) Regulations, 1992 is available on Hr portal.

3. Gifts and Hospitality

3.1 Gifts: -

For vendors and prospective vendors: -

- a. It is customary at times to receive unsolicited gifts during the traditional festive seasons or during certain corporate events.
- b. These will be restricted to promotional or advertising material or such items that are customary or considered to be prudent or of a symbolic nature by the management, having regard to the nature of the business, the type of markets in which Accelya India is operating and the event being observed.
- c. It would however be unethical and incorrect to receive any gift with the intent to give any benefit in return.

3.2 Hospitality: -

- a. The handling of offers of hospitality is recognized as being much more difficult to regulate but it is an area in which employee must exercise careful judgment.
- b. There is also a need to distinguish between simple, low cost hospitality of a conventional type. For example, a working lunch or evening meal compared with more expensive and elaborate hospitality. There is clearly a need for a sense of balance.
- c. Acceptance of frequent, regular or annual invitations to events or functions, particularly from exiting / prospective suppliers or contractors, where a considerable degree of hospitality is involved should be refused.

4. Attending Vendor Organized Conferences, Events & Functions

A vendor is defined as any individual / organization which offers / supplies any service or goods to the Company. To avoid any potential conflict of interest decline invitations for any kind of events by current or potential vendors / suppliers. However, if deemed necessary, invitations for conferences, seminars, award functions or evangelist events sponsored by vendors can be considered and need to go through defined email based approval process. Approval requests, where applicable, should mention the

purpose of visit, sponsorship details and a list of events attended in the current Financial Year along with duration. HR Operations should be marked in all the approval related mails and the employee needs to apply OD on HR portal. The total number of events attended by the employee shall not exceed 10 working days in Financial Year.

Approval Process

- a. events which are held outside the country or within the country but in another city, and where the travel, stay and / or incidental expenses are fully sponsored by vendor, are not to be attended. Any exceptions to this policy needs, to be referred to Business Unit Head for approval.
- b. events which are held locally, and where the travel, stay and/ or incidental expenses are fully sponsored by vendor, can be attended, only after written approval from Business Unit Head.
- c. events which are held outside the country or within the country, and where the travel, stay and / or incidental expenses are partly sponsored by vendor, can be attended, only after budgetary approval from Business Unit Head.
- d. events which are held outside the country or within the country but in another city, and where the travel, stay and / or incidental expenses are fully funded by Accelya India can be attended, only after budgetary approval from Business Unit Head.
- e. events which are held locally, and where the travel, stay and / or incidental expenses are fully sponsored by Accelya India can be attended, only after budgetary approval from Business Unit Head.
- f. events attended by employees at own cost, outside the country need approval from Business Unit Head and for events where domestic travel is required need approval from Business Unit Head and HR Business Partner. In either case the leave of absence has to be applied as per normal process.
- g. events that are held locally, in the evening for a few hours, can be attended by employee after approval from Business Unit Head.
- h. events attended by an employee at their own cost:
 - i. Approval required from Business Unit Head and HR Business Partner.
 - ii. apply Leave of Absence for the duration of the event, unless it is attended beyond office hours.

5. Events Organized by Industry Bodies

- a. Industry Conferences, Seminars, Award Functions and Evangelist events, held by Industry Bodies like NASSCOM and IATA, which are part of Organization's strategy or knowledge enhancement

program / workshop, published plans & part of pre-approved budgets, need to follow business as usual approval process.

- b. Industry Conferences, Seminars, Award Functions and Evangelist Events held by Industry Bodies Like NASSCOM, IATA, CIO council, CTO Forum which are not part of the Organization's strategy or published plans can be attended as per following approval process:
 - i. events held in international locations and events held within the country but outside city of work approval from Business Unit Head and HR Business Partner.
 - ii. events held locally in city of work: approval from Business Unit Head.

6. Company information for use by Vendor as References

Company name and / or information may be provided as reference for use in vendor's sales, marketing activities, no data / information should be mentioned which is beyond organization's public domain. Contents of all written references need to be reviewed and approved by Marketing Head & Business Unit Head.

7. Donations from Vendors for NGOs/ Corporate Social Responsibility Partners

Employees should not solicit any donations, either in cash or kind from current or potential vendors towards any Social Organization / NGOs / Corporate Social Responsibility Partners that the Company engages with and or that an employee supports in his personal capacity.

8. Award Nomination Submission

Nominations for award/s, publishing articles / papers as representative of our company in industry events /magazine which are not part of organizational initiatives planned by Marketing department, either in organization category or an individual category can be sent, subject to restrictions & approvals from HR Business Partner, Marketing Head & Business Unit Head as mentioned below:

- a. no customer data / reference to be shared
- b. no reference to Organization's data beyond public domain information

9. Facilitation Payments

Accelya India do not welcome or encourage facilitation payments. Such payments may be made only when they are legal, small, customary in the circumstances, and are used to secure an outcome to which the Company is legally entitled. In situations where payment is unavoidable, the amount must be openly

recorded and employees / consultant / trainee and insource staff should seek reimbursement under the normal approval procedures. Where it is practical, consult local management and agree to the payment in advance.

10. Suspected Fraudulent Behavior

Any fraudulent act of commission or omission particularly bribery, fraud, pilferage, theft, infringing third party rights will be termed as misconduct. Any such suspected fraudulent behavior is liable to be investigated and is/are liable to face appropriate disciplinary action including dismissal from the services of the Company.

11. Outside Employment or any other type of association

- a. devote full time attention to the business of the Company and not take on any assignment which is monetary in nature and / or directly or indirectly conflicting with organization's business area without proper authorization.
- b. not to indulge in any activities related to International Trade Control.

12. Dignified Communication Employees/consultants/trainees and insource staff

- a. will be truthful, helpful and accurate in our communication.
- b. understands that effective communication is vital to avoid misrepresentations, misleading impressions or untruths.
- c. all communication material shall be prepared and will be adequately backed by documentation to support any claim or statement made.
- d. will not disclose any information of the Company while in employment as well as after the termination in any forum including social media.

13. Company's Governance

- a. information posted on the Company's website(s) will be correct and truthful.
- b. will provide reliable and meaningful information on a timely basis about Accelya products, services, operating results and other activities to legitimately interested persons and as may be required by law, subject to considerations of the legal requirements, cost and confidentiality.

- c. given the sensitivities involved, specific persons or groups will be authorized to communicate on specified matters, and no other person would be expected to communicate in an out-of-turn way on those matters.
- d. will maintain communication through its internal communication systems and through consultation process.

14. Commitments

Employees / consultants / trainees and insource staffs:

- a. will ensure that commitments made on behalf of the Company are suitably authorized within the Company and are supported by the ability of the Company to deliver accordingly.
- b. understand that decisions, commitments or business agreements made are seen by the outside world as having been made by the Company. Accelya India's reputation as a trusted company is built on the track record that justifies confidence in these commitments.
- c. will take advice from experts and experienced authorized personnel within the Company to meet external expectations/customer expectations.
- d. will follow the applicable 'Delegated Authority'. With that authority, also comes a duty to involve anyone else who may have responsibility for that decision, and to make sure that everything has been accurately recorded.
- e. will report to HR department of any suspicious behavior noticed.

15. Maintaining Confidentiality of Information

Employees / consultants / trainees and insource staffs:

- a. will protect the confidential information of the Company, employee and customer information.
- b. while working with different customers, will ensure the strictest confidentiality is maintained at all times and no data or information is shared about a customer with anyone. Any violation of this could result in a recommendation for termination.
- c. understand and agree that revealing confidential company information could affect the Company's competitive advantage.
- d. will also be expected to be very careful when discussing confidential Company information and business in public places.
- e. will first ensure they are speaking to the right person before disclosing information that might be commercially sensitive.
- f. will go through and understand the Company's information security system guidelines/rules/processes and shall strictly comply with the same.

- g. will ensure that disclosure of information shall only be made to the extent necessary to achieve the Company's commercial goals.
- h. will treat e-mail communication/s with the same professionalism and confidentiality as other more 'traditional' forms of communication as e-mails can have legal consequences too.
- i. Is aware and understands that due to the nature of Company's business the Company holds a lot of information which is confidential and proprietary to the Company, its customers, vendors and/or other third parties. Such third parties trust the Company to keep such confidential and proprietary information protected from unauthorized disclosure and the Company trusts to keep such confidential and proprietary information protected from unauthorized disclosure.
- j. agree to use the information for the purpose for which it was entrusted and to protect the confidential information.
- k. is aware and understands that there is an increasing amount of data protection legislation throughout the world, driven by people's concern that information might be used for the wrong and unauthorized purposes. If the Company is in breach of such legislation the Company would be liable to pay damages and the Company's reputation and the trust that customers/vendors/third parties people have placed in the Company.
- l. understands that during the term of employment/engagement, they will have access officially and unofficially to such information of the Company that will be confidential and proprietary in nature and therefore hereby agree / declare and undertake that:
- m. the deliverables and all inventions, discoveries, improvements, specifications, source code, object code, programming and other documentation, designs, methods, devices, systems, computer software, writings, compilations of information, and/or materials that are the intellectual property of the client of the Company ("Client") or the Company and all that is conceived, designed, practiced, prepared, produced or developed either alone or in concert with others:
 - i. in the course of my employment/engagement,
 - ii. based upon knowledge or information learned or gained from any assignment or
 - iii. that results from the use of the Company's/Client's facilities, personnel, or materials, are and shall be the sole and exclusive property of the client/Company as the case may be.
- n. no intellectual property rights shall be transferred by virtue of the employment / engagement.
- o. not to reverse engineer, disassemble or decompile the proprietary product/information of the Company/Client.

16. Dress Code

Guidelines:

Employees are expected to demonstrate good judgment and professional taste. Courtesy to co-workers and professional image to clients should be the factors to assess that appropriateness of dressing at work place.

Respect and maintain professional standards of appearance consider the norms of business, cultural, and international differences when meeting customers/clients and working with your colleagues in other locations. We follow a consistent Business Casual dress code throughout the week. Business Casual means attire suitable for a work environment and does not permit overly casual clothing such as but, not limited to trainers, shorts, collarless and round neck t-shirts. When dressing in business casual attire, employees should keep in mind all appointments with company customers, suppliers or vendors and dress accordingly.

Suggested Guidelines for Men & Women:

Acceptable Attire:

- Formal or office casual shirts, plain/simple T-shirts with collar;
- Trousers, Chinos, cotton, wool or synthetic Pants;
- Slacks, cotton / synthetic bottom wear which is not fancy;
- Single color plain Jeans without holes, frays, acid wash, ripped etc.
- Business formals during client visits and interactions;
- Skirts, dresses and skirted suits minimum knee length;
- Indian formal female clothes including saree;
- Clean formal shoes or appropriate footwear;
- Casual shoes on last day of the working week;

Not- acceptable Attire:

- Collarless T-Shirts such as round neck, V-neck, scoop neck, boat neck etc.
- Discernible rips, holes, torn cloths. Examples of inappropriate clothes include but not limited to, clothes with slogans, tank tops, muscle shirts, camouflage and crop tops, tube tops; halter tops; midriff tops; T-shirts with potentially offensive words, terms, logos, pictures, cartoons, or slogans; sweatshirts as well as low cut, see-through or backless tops or dresses;
- Examples of inappropriate bottom wear include but not limited, shorts, camouflage and pants worn below the waist or hip line, sweatpants, exercise pants, bib overalls, and any spandex or other form-fitting pants such as biking pants;
- Short tight skirts, mini-skirts, sundresses, beach dresses and spaghetti-strap dresses;
- Clothing with profane language statements or clothing that promotes causes that include, but are not limited to, politics, religion, sexuality, race, age, gender, and ethnicity;
- Hunting boots, casual slip-ons, slippers, floaters, flip-flops, floppy sandals;

Personal Grooming

- Hair, beard and nails should be clean and groomed.

- While at work, employees should cover visible body piercings (except on commonly accepted body parts) or fancy tattoos.

Perfume, Cologne and Makeup

- Avoid perfumes, colognes, deodorants with strong fragrances which could be disturbing to others.
- Minimal make-up, appropriate to work place is allowed.

These dress code guidelines will remain in force, except during specified periods e.g.: festivities, team outings etc. An employee, whose attire is not consistent with these guidelines, to be cautioned by his/her manager to pay closer attention to the choice of clothes or attire. Continued disregard of these guidelines may cause further action as Management may deem fit.

17. Protecting Company Asset

Employees / consultants / trainees and insource staffs:

- a. will protect the Company's brand, physical, financial and intellectual assets.
- b. will be responsible as individuals for the security and protection of the assets of the Company whether used while undertaking assignments or not. This will include the proper accounting for the use of any company resources. The Company property - equipment and intellectual property rights such as patents, trademarks, copyrights, designs, strategies, plans, trade secrets and similar items that are not in the public domain, will be used only in the course of, and for Company business, with proper care and safeguards as authorized by the Company.
- c. will innovate and may take well-reasoned and duly authorized risk.
- d. have no rights or lien over any inventions that arise in the course of employment/engagement.
- e. understands that the Company's most valuable assets is its brand name and its products and solutions and its reputation. A strong brand is essential for sustainable success, especially in fast-changing and highly competitive markets. The Company's brand will be protected with the greatest possible care.
- f. will not infringe the intellectual property rights of the Company or any other party. For example, we respect copyright in third party software

18. Management and Mitigation of Risks

Employees / consultants / trainees and insource staffs:

- a. will assess and manage risks in the Company's business with advise from the Management
- b. understands that the way a business manages its risks is critical to its success. These risks cover commercial, financial, operational and compliance risks. There is also increasing external

pressure to demonstrate that a business takes appropriate steps to control unnecessary risks. Company will have to take decisions about acceptable risks and levels of risk as part of everyday business.

Individual operations will have a system for managing risks, this would involve firstly identifying and assessing potential risks to achieving the Company's objectives, then deciding which risks to accept and how to manage them.

19. Relating with Stakeholders

19.1 Customers

- a. It is the Company's endeavor that its products and services shall be technologically competitive and whilst fulfilling the needs of its customers, it shall offer the best possible value to its customers such that it becomes the customers' first choice for quality and service. Employees / consultants / trainees and insource staffs will ensure no false or misleading claims shall be made whilst marketing the Company's products or services and will ensure that the service standards shall be of the highest possible order.
- b. Mutually beneficial relationships of an enduring nature will be built with customers will share with the management of the Company to meet the needs and expectations of customer's complaints.

19.2 Employees

- a. The Company wants to attract, develop and motivate the best people. The Company will create a work environment that is open, honest and unprejudiced and which encourages people to achieve their full potential. The Company will value people's individual and team contributions, and offer opportunities to share in the company's commercial success.
- b. The Company will recruit, employ and reward on ability and contribution. The Company will provide opportunities for personal growth and professional development and engage in appropriate communication and consultation with employees. The Company will promote a healthy lifestyle.

19.3 Partners

- a. The Company will cultivate a global network of collaborative and mutually beneficial alliances and will respect an alliance's customs and traditions, be honest and ethical in its dealings.
- b. The Company will work with partners/alliances in the creation of successful ventures, which have high standards of integrity and business practice. The Company will use values and

principles in dialogue with other organizations and in considering new and existing relationships.

19.4 Suppliers

The Company will value the diversity of its suppliers and will work with them in innovative ways that create added value for the Company's customers and trading partners.

The Procurement policy applies to all purchases made above Rs. 10,000/-. The Procurement policy is available on Hr portal.

19.5 Community

- a. The Company will contribute to the well-being of the societies in which it operates through business activities and the skills of its people.
- b. The Company will maintain the highest level of integrity while respecting local laws, customs and traditions and will work with the community and other organizations to support non-profit making activities that benefit wider society. The Company will use its influence to reinforce the liberating and empowering potential of technology.

20. Maintaining an Equitable and Safe Workplace

20.1 Diversity

The Company will treat all individuals fairly and impartially, without prejudice, and never tolerate harassment in any form.

The Company is committed to developing a working culture that is fair and 'inclusive':

- a. enabling employees, consultant/trainees and insource staffs to make their distinctive contributions to the benefit of the business and the Company.
- b. we are a secular company and respect all regions and religions.
- c. shall refrain from indulgence in any religious behavior/celebrations on premises of the Company as well as that of clients during the course of office/ working hours.
- d. shall refrain from using Company provided modes of communication and / or modes of communication provided by client for expression of and/ or communication of any religious information and any non-compliance thereof is against the best practices and policies of the Company.
- e. the Company expects its managers to exercise leadership in this field by discouraging prejudice and by role modeling appropriate behavior.

21. Equal Employment Opportunity

The Company will be an “equal opportunity” organization that prohibits discrimination or harassment based on race, color, religion, national origin, sex, age, sexual orientation, marital status, citizenship status, or disability.

22. Prevention of Sexual Harassment (POSH)

The Company prohibits any kind of sexual harassment. Sexual harassment includes making unwelcome advances, sexual flirtations or propositions, continual or repeated verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, humor and jokes about sex or gender specific traits, sexual innuendo, display in the workplace of sexually suggestive objects or pictures, and transmission of sexual messages via voice mail, regular mail, e-mail or the Internet or Intranet. Any complaint related to Sexual Harassment will be investigated as per the legal guidelines and norms.

An Internal committee is formed at each location consisting of 5 members with at least 50% women representation in each committee and headed by a lady employee in leadership position centrally of to proactively address issues related to sexual harassment and to provide the procedure for resolution, settlement or prosecution of related acts. The committee will also have representation from independent NGO.

The names of the committee member are displayed at all locations.

Process of redressal of complaint of sexual harassment:

- a. any complaint regarding Sexual Harassment needs to be made to the committee
- b. Any complaint received by the members should be immediately forwarded to the Chairperson and this must be notified to other committee members at the earliest and not later than 3 days and a meeting should be called for discussing the matter
- c. The Committee shall discuss and decide on its jurisdiction to deal with the case or reject the complaint prima facie and recommend to the company that no action is required to be taken in the matter
- d. Notice shall be issued to the respondent within 7 working days of receipt of the complaint and 10 working days shall be given for submission of reply (along with the list of witnesses and documents.)

- e. all the discussions, investigation, findings and conclusion needs to be documented by Convener
- f. while investigating, the committee will follow principles of natural justice and provide opportunity to both sides to put forward their case and explanation/evidence and handle the investigations sensitively.
- g. the decision of the Committee shall be final and any action/reprimand will be commensurate to the offence.
- h. in case where the complaint is against any member of the committee, the same needs to be made to Head of HR and MD of the Company and they will appoint a committee and that committee's decision will be final.
- i. the committee will be trained on how to conduct investigations and will be allowed to carry out investigation only after training.

23. Health and Safety

The Company will care for the health and safety of its employees / consultants / trainees and insource staffs. The Company will be responsible for making sure that the way it conducts its business does not harm the health and safety of its own people or anyone else affected by its activities, products or services.

24. Environmental Compliance

There are no harmful effects from the Company's business on the environment. However if there are any such effects anytime in the future then the Company will minimize the potentially harmful effects of its activities on the environment.

The Company will be committed to protect and preserve the environment. The Company will endeavor to reuse rather than dispose whenever possible any disposed material. The Company will also promote recycling and the use of recycled materials.

25. Human Dignity

The Company is committed to protecting and enhancing the human dignity of its employees / consultants / trainees and insource staffs.

26. Whistleblower Policy

Employees / consultants / trainees and insource staffs wishing to raise a concern about serious irregularities within the Company or its employees can do so under Whistleblower Policy. The policy provides a framework to promote responsible and secure whistle blowing process and defines scope, coverage and guidelines of Whistle blowing process for employees and investigation process. Please refer to Whistleblower Policy on HR portal.

27. Grievance Handling Mechanism

The Company's grievance resolution procedure is as follows:

- a. any grievance to be reported to either an HR official / immediate superior / Business Unit Head.
- b. the HR official / immediate superior / Business Unit Head should meet the complainant on the same working day and record the grievance.
- c. depending on the seriousness and consequences of the grievance, the concerned official has to decide on the resolution or further course of action as:
 - i. if the issue can be resolved by dialogue, the same must be done within 3 working days and must be documented with HR.
 - ii. if the issue requires intervention by a senior grade member or HR, a committee of three members (with at least one female representative) must be formed within 5 working days and the issue must be documented at all the levels of dialogue.
 - iii. while investigating, the committee will follow principles of natural justice and provide opportunity to both sides to put forward their case and explanation/evidence.
 - iv. the decision of grievance handling committee shall be final and any action/reprimand will be commensurate to the offence.

28. Disciplinary Action

Disciplinary actions can be initiated by the Company against the violation of Code of Conduct Policy. The Company, despite its pro people practices, would choose to deal sternly with cases of indiscipline or misconduct. Engaging in any of the following activities, as well as violations of any or policies, may be subject to disciplinary action including dismissal of services:

28.1 Attendance

- a. habitual late or irregular attendance.
- b. absence without leave or overstaying the sanctioned leave for more than 10 consecutive days without sufficient grounds or proper or satisfactory explanation.

- c. absence from the employee's appointed place of work without permission or sufficient cause.

28.2 Safety & Health

- a. violating safety regulations.
- b. creating or contributing to any unsanitary condition.
- c. using, abusing or being under the influence of intoxicants or narcotics on company premises.
- d. interference or tampering with any safety devices installed in or about the premises of the company.
- e. improper use of office equipment.
- f. possessing firearms, weapons, explosives etc. on company premises.

28.3 Misuse of Property

- a. damage to, or improper use of, company property either willfully or through gross negligence.
- b. unauthorized possession of company property.
- c. disclosure of confidential company information to outsiders without proper authorization.
- d. unauthorized use of bulletin boards and /or posting notices in unauthorized places.
- e. stealing or committing any criminal offense on company property.

28.4 Misconduct

- a. fighting, hitting, pushing, forcibly grabbing another employees / consultants / trainees and insource staffs, client contractor or business associate or otherwise committing an assault and /or similar physical acts or threats while on company premises or in circumstances arising out of company business relations.
- b. drunkenness or riotous or disorderly or indecent behavior in the premises of the company or outside such premises where such behavior is related to or connected with the employment.
- c. sleeping while on duty.
- d. using abusive or threatening language.
- e. any act of harassment, sexual, racial or other; telling sexist or racial-type jokes; making racial or ethnic slurs.
- f. disorderly, offensive, or immoral conduct.
- g. commission of a felony or crime involving dishonesty while employed by the company
- h. gambling on company premises.
- i. careless or willful destruction or damage to company property or the property of other employee of a company client.

- j. falsification of company records, including, but not limited to, financial records, travel expense vouchers, medical bills and other employee forms and documents.
- k. unauthorized dissemination of personal information form (employee filed), or improper use of such information.
- l. refusal or failure to carry out a reasonable job assignment or job request after being warned that failure to do so could result in a recommendation for termination.
- m. excessive use of company telephone, email or Internet for personal use.
- n. any behavior that is seriously disruptive of the normal flows of company business and is unlawful in nature.

In case the employees / consultants / trainees and insource staffs has a concern in any of the above-mentioned Disciplinary Incidences he will discuss it out with his department head to mutually develop an effective solution.

However, if the problem persists and he is consistently found at fault disciplinary procedure will be followed depending on the gravity of the situation, towards maintaining the decorum of the organization. The HR Business Partner after mutual discussion with the Business Head will take a final call on the same. For any cases of information security the matter will be reported to Chief Information Security officer (CISO).

29. Disciplinary Procedure

29.1 Oral Warning

It will describe the behavior or circumstances that made the oral warning necessary. It will be designated as an oral warning and express continued support for the employee with the knowledge that the employee will improve his or her actions or behavior.

29.2 Written Warning

It will include the reasons for the manager's dissatisfaction and any supporting evidence. The employee will have an opportunity to defend his/her actions and rebut the opinion of his manager at the time the warning is issued.

29.3 Termination

Based on the gravity of the situation and consistent breach of disciplinary process herein the employee may also be terminated from the services of the company.

Note: The management has the right to amend or modify this Policy in whole or in part, at any time without assigning any reason, whatsoever.