CODE OF CONDUCT



Contents

CODE OF CONDUCT	2
CODE OF CONDUCT OBJECTIVE	2
SCOPE/COVERAGE	
RESPONSIBILITY	2
KEY POLICY-CLAUSES	2
DISCRIMINATION & HARASSMENT POLICY	4
COMMON POLICY-CLAUSE	4
DISCRIMINATION	4
HIGHLIGHTING POINTS	5
HARASSMENT	6
SEXUAL HARASSMENT	7
PROHIBITIVE CONDUCT	8
EXCEPTIONS	9

CODE OF CONDUCT

OBJECTIVE

To maintain cohesive and collaborative relationships with supervisors, colleagues, team members, clients, and stakeholders, cultivating ethical and professional engagements within the organization and the wider community. Committed to upholding high standards of integrity and transparency for sustained excellence.

SCOPE/COVERAGE

This policy is applicable to all levels of employees of the company.

RESPONSIBILITY

Every staff member employed by the company bears the responsibility of complying with the regulations outlined in this policy.

KEY POLICY-CLAUSES

- a. The adherence to the Code of Conduct is mandatory and applies to every employee as a binding obligation.
- b. Failure to adhere to the Code of Conduct may result in disciplinary consequences ranging from minor to major measures, potentially impacting the employee's career, up to and including termination or dismissal.
- c. The salient features of the CODE OF CONDUCT applicable to the employees are as under:
 - I. All employees shall display complete loyalty towards the organization.
 - II. All employees shall follow Company rules and regulations framed from time to time.
 - III. All employees shall strictly observe the working hours prescribed.
 - IV. All employees shall follow job instructions given to them by their superiors and achieve their mutually agreed targets.
 - V. All employees shall be expected to observe strict moral and ethical standards in their work and personal life.
 - VI. The employees shall not criticize the Company and the Company policies in any instance within or outside the Company. If they have any suggestions, comments or concerns on the same they shall be welcomed to route it through the proper channels.

- VII. All employees shall be expected to follow organization hierarchy accepting orders and giving instructions for work. Refusal to obey in the instructions of the superiors shall be a serious case of misconduct.
- VIII. All employees shall work in such a way as to ensure complete personal integrity.
- IX. All employees shall be expected to protect Company property and keep the Company information confidential wherever required.
- X. No employee shall accept any part-time or full time paid job outside the organization. If they desire to take up some exceptional assignments outside, it shall be accepted only with the approval of the appropriate authority.
- XI. No employee shall publish or cause to be published an article written by him or her on any matter relating to the Company in any local, national or overseas newspaper, journal or any other publication without the written permission of the Management.
- XII. No Employee shall neither consume nor bring alcohol inside the office premises/ workplace nor shall he or she enter the office premises /workplace in an intoxicated state after having consumed any type of alcohol.

DISCRIMINATION & HARASSMENT POLICY

COMMON POLICY-CLAUSE

- a. The Company shall be committed to providing and maintaining an open and positive work environment, which is free from any discrimination or harassment.
- b. All employees must be treated with respect, dignity, and courtesy.
- c. There shall be no discrimination or harassment against any person on the grounds of race, complexion, religion, national origin, disability, age, sex, marital status, sexual orientation or citizenship.
- d. Any discriminatory action against full time employees, contractual employees, clients, or vendors shall be met with disciplinary action.
- e. Every complaint shall be promptly and thoroughly investigated and strict confidentiality maintained as far as the situation would permit. Furthermore, the Company does not retaliate against any employee for bringing questionable circumstances to attention.
- f. Along with the preceding points in the policy, the foregoing paragraphs under this policy shall be covered.

DISCRIMINATION

Discrimination refers to the unjust or prejudicial treatment of individuals or groups based on certain characteristics, such as race, gender, age, religion, disability, sexual orientation, or other factors. Discrimination involves treating people differently and less favorably because of these characteristics, often leading to the denial of rights, opportunities, or fair treatment.

There are various forms of discrimination being identified, including:

- 1. Racial Discrimination: Treating individuals unfairly based on their race or ethnicity.
- 2. **Gender Discrimination:** Unfair treatment of individuals based on their gender or sex.
- 3. **Age Discrimination:** Discrimination based on a person's age, particularly against older or younger individuals.
- 4. **Religious Discrimination:** Treating people unfairly due to their religious beliefs or practices.
- 5. **Disability Discrimination:** Unjust treatment of individuals with disabilities, often involving barriers that prevent their full participation in society.

- 6. **Sexual Orientation Discrimination:** Treating individuals differently based on their sexual orientation, such as discrimination against LGBTQ+ individuals.
- 7. **Social Class Discrimination:** Unfair treatment based on a person's socioeconomic status or class.

HIGHLIGHTING POINTS

- a. If an employee is encountering discrimination or harassment, he/she may take the following course of action:
- ✓ The staff is being prejudiced may immediately communicate to the verbally or by imply the dislike or the unpleasantness
- ✓ If not report this action immediately to the hierarchy (immediate supervisor, HOD or BM/OIC or Head of HR)

HARASSMENT

Introduction

Harassment in an organizational context refers to any unwanted behavior, conduct, or communication that creates a hostile or intimidating work environment for an individual or group of individuals. Harassment can manifest in various forms, and it is typically based on certain protected characteristics, such as race, color, religion, sex, national origin, age, disability, or other factors.

Common types of harassment in the workplace include and not limited to:

- Sexual Harassment: Unwelcome sexual advances, requests for sexual favors, or other verbal or
 physical conduct of a sexual nature that interferes with an individual's work performance or creates
 an offensive, hostile, or intimidating work environment.
- 2. **Discrimination:** Harassment based on an individual's race, color, religion, sex, national origin, disability, or other protected characteristics, resulting in a hostile or intimidating work environment.
- 3. **Bullying:** Persistent, offensive, intimidating, or insulting behavior that seeks to undermine, humiliate, or create a hostile work environment for an individual or group.
- **4. Verbal Harassment:** Unwanted comments, slurs, or insults that create an offensive or hostile work environment.
- 5. **Cyberbullying:** Harassment conducted through digital communication channels, such as email, social media, or messaging platforms.

SEXUAL HARASSMENT

A sexual harassment policy outlines the company's stance on preventing and addressing sexual harassment, as well as the procedures for reporting and resolving complaints in such nature. Stated below are some common elements found in effective sexual harassment policies:

- 1. **Definition of Sexual Harassment:** Clearly define what constitutes sexual harassment, including both overt and subtle forms of misconduct. This may include unwelcome advances, requests for sexual favors, inappropriate comments, or any other unwanted conduct of a sexual nature.
- 2. **Scope of Policy:** Specify that the policy applies to all employees, including management, staff, contractors, and any other individuals associated with the company. Ensure that the policy covers all work-related activities, including off-site events and social gatherings.
- 3. **Prohibition:** Explicitly state that sexual harassment is strictly prohibited in the workplace. Make it clear that the organization will not tolerate any form of harassment and that violations will result in disciplinary action, up to and including termination.
- 4. **Reporting Procedures:** Clearly outline the procedures for reporting incidents of sexual harassment. Provide multiple reporting options to make it accessible for victims, and ensure that there are mechanisms for reporting harassment by supervisors or colleagues. Assure employees that they can report incidents without fear of retaliation.
- 5. **Confidentiality:** Emphasize the confidentiality of the reporting process to the extent possible. Ensure that information related to complaints is shared on a need-to-know basis, protecting the privacy of those involved.
- 6. **Investigation Process:** Detail the steps that will be taken to investigate complaints of sexual harassment. This may involve an internal investigation, potentially including interviews with the complainant, the accused, and any witnesses. Ensure a fair and impartial process.
- 7. **Consequences and Remedial Actions:** Specify the potential consequences for individuals found guilty of sexual harassment. These may include disciplinary actions such as counseling, training, suspension,

or termination. Also, outline potential remedial actions to prevent further incidents and address the impact on the victim.

- 8. **Education and Training:** Highlight the organization's commitment to providing regular training on sexual harassment prevention. Training should educate employees about what constitutes harassment, how to report incidents, and the consequences for engaging in such behavior.
- 9. **Non-Retaliation Clause:** Clearly state that the organization prohibits retaliation against individuals who report incidents of sexual harassment or participate in an investigation. Reiterate the commitment to maintaining a culture that encourages reporting without fear of reprisal.
- 10. **Communication and Awareness:** Ensure that the policy is communicated effectively to all employees and that they are aware of its existence. Regularly reinforce the organization's commitment to a harassment-free workplace through various channels.

The laws and regulations related to sexual harassment may vary by jurisdiction, therefore the company will ensure that this policy complies with local legal requirements. In an event of a dispute, will always refer to the prevailing law of the country.

PROHIBITIVE CONDUCT

Specific types of prohibitive conduct include, but are not limited to:

- i. Request for sexual favors.
- ii. Verbal or physical conduct of sexual nature.
- iii. Discussion of a person's physical characteristics or dress.
- iv. Any unwelcome advances.
- v. Use of offensive language or demeaning terms.
- vi. Narrating offensive jokes or sexually explicit stories.
- vii. Circulation or posting of offensive pictures
- viii. Objectionable physical proximity or contact.
- ix. Spreading rumors or talking to third parties about an individual in a demeaning fashion

NOTE: All the above is prohibitive through any mode of communication including in person, over the phone, on voice mail, through pen and paper, on e-mail, through chat, through SMS or any other form of communication.

EXCEPTIONS

- Harassment shall not include occasional compliments or voluntary relationships between individual employees.
- However, in case of voluntary relationships, employees must ensure that the work environment is free from favoritism and the relationship does not affect work in any way.