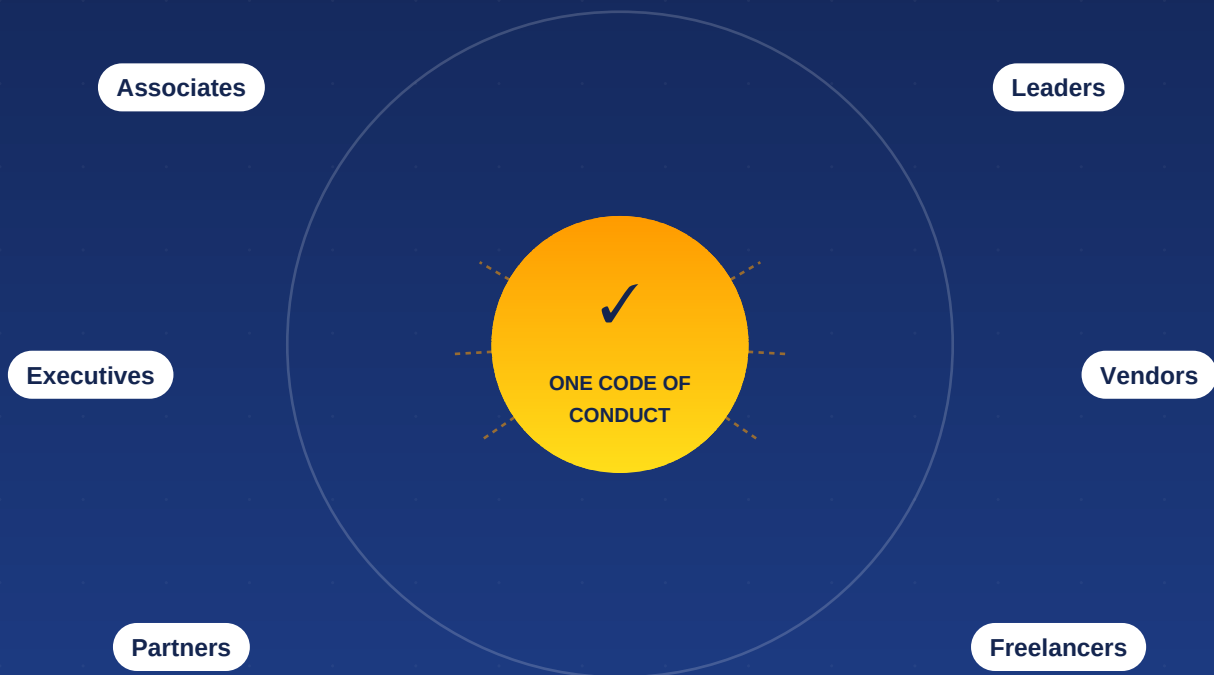




♦ THE NTPL CODE OF CONDUCT · ETHICS · INTEGRITY · RESPECT

Our Standards. Our Commitment.

How everyone who works with Namisite — associates, leaders, executives, vendors, partners and freelancers — is expected to act, every single day.



POLICY

Code of Conduct

EFFECTIVE

17 Aug 2017

APPLIES TO

6 groups

PUBLISHED

Mar 2023

Why we have a Code of Conduct

NAMISITE is committed to the highest standards of ethics, trust, respect and open-mindedness, both inside and outside the company.

Policy objective

NAMISITE requires all its employees to observe the highest standards of integrity and honesty and to act with due skill, care, diligence and fairness in the conduct of day-to-day business, and to comply with the laws and regulations of the company and the statute they operate in. This Code is not exhaustive and cannot cover every situation that may arise — its spirit is to deter wrongdoing and to promote and foster a culture of honest, ethical conduct in personal and professional relationships.

Who it covers

This policy covers all employees of the company across every department and location, and equally applies to associates, leaders, executives, vendors, partners and freelancers who work with NAMISITE.

Trust & Respect

A culture of trust, respect and open-mindedness, inside and outside the company.

Integrity & Honesty

The highest standards of integrity, honesty, skill, care and fairness, every day.

Compliance

Full compliance with the laws and regulations of the company and the statute it operates in.

What this Code covers

- Protecting company assets, property & intellectual property
- Fair competition & conflicts of interest
- Gifts, business courtesies & anti-bribery
- Respect, diversity & anti-harassment
- Technology use, confidentiality & insider information
- Media relations, environment & social responsibility
- Accounting standards & equal opportunity
- Misconduct and its consequences
- Political activity, confidentiality & private trade/employment
- Drugs & alcohol

Protecting Company Assets & Property

Every NAMISITE employee has a duty to protect the company's tangible and intangible assets from loss, damage, misuse, theft or sabotage.

7.3.1 Protecting company assets

All NAMISITE employees are responsible for protecting NAMISITE's assets, including tangible assets such as materials, equipment and cash, as well as intangible assets like computer systems, trade secrets and confidential information. Employees must use NAMISITE's assets, facilities or services only for lawful, proper and authorized purposes.

7.3.2 Intellectual property

NAMISITE recognizes the value of intellectual property such as patents, designs, trademarks, trade secrets and copyrights, including computer programs, and will vigorously defend and protect its own intellectual property rights. At the same time, it is imperative to respect the rights of others — employees must not knowingly infringe upon the intellectual property rights of others.

Work product belongs to NAMISITE

NAMISITE will have complete right over any intellectual property created as part of your job — not restricted to patents, processes, or any best practices.

Fair Competition & Conflicts of Interest

Every business decision must be made, and every business activity conducted, in the best interests of NAMISITE — never a personal one.

7.3.3 Fair competition

NAMISITE supports free competition and seeks to compete fairly within the framework of all applicable antitrust, competition and fair trade laws and regulations.

7.3.4 Conflicts of interest

- All business decisions must be made, and all business activities conducted, in the best interests of NAMISITE. Employees must disregard any personal preference or advantage; a conflict of interest occurs when a private interest interferes in any way with the interests of NAMISITE.
- Employees should avoid any investment, activity, association or situation that conflicts with their exercise of independent judgment in the company's best interest, or which might lead their personal, family or financial interests to conflict with those of the company.
- If there is, or may be, a potential conflict of interest, the employee must disclose this to their superior.

Gifts, Bribery & Business Courtesies

NAMISITE does not espouse the payment or receipt of gifts or bribes for business or financial gain — business decisions are based on merit, not favours.

7.3.5 Handling gifts or other benefits

The company does not espouse the payment or receipt of gifts or bribes for business or financial gain. No employee or representative of the company should do anything that could give an impression that the company could be influenced in this manner. NAMISITE is strongly committed, in its business relations with suppliers, customers and service providers, to the highest standards of ethical conduct and full compliance with all applicable national and international laws, taking into account cultural and country-specific conventions. Business decisions are based on objective criteria — competitive price, quality and service, as well as the business partner's reliability and integrity.

Integrity

Commercial bribery — active or passive — is illegal and subject to criminal sanction or disciplinary action. Employees may not, under any circumstances, request, give or receive monetary gifts. Small non-monetary gifts of limited value may be accepted only within the bounds of accepted business hospitality.

Transparency

Employees must inform their superior about any benefit of any kind offered to them. If unsure whether a gift meets these requirements — or if refusing it would embarrass the giving partner — consult your direct superior before acting.

Two maxims apply to every gift or benefit

Group funds must never be used, directly or indirectly, to make payments to government officials or employees of state organizations for unlawful or improper purposes. Gifts and entertainment to any third party must be modest in value, consistent with customary business practice, and never offered if public disclosure would embarrass NAMISITE or the employee. Unsolicited gifts outside acceptable limits should be returned or donated to a reputable charity.

Respect, Diversity & Anti-Harassment

Mutual respect is a core principle of NAMISITE's corporate culture — discrimination or harassment of any kind has no place in our company.

Respect individual diversity

- All employees shall be treated with equal respect and dignity, and provided equality of opportunity to develop themselves and their careers. People working cooperatively toward a set of mutual objectives are the driving momentum behind our business.
- Discrimination or harassment has no place in our company. Any type of personal harassment — regardless of intent, direct or indirect, physical or verbal — is unacceptable.

Zero tolerance for sexual harassment

Please refer to the HR Policy sections on “Harassment and Discrimination” and “Sexual Harassment” for more detail. Sexual harassment in particular will not be tolerated. Anyone who believes they have been sexually harassed should report the incident and circumstances to their immediate manager or the HR Department, who will arrange for it to be investigated impartially and confidentially.

Equal opportunities

NAMISITE values the individuality, diversity and creative potential that every person brings to its business. Judgments about people for recruitment, development and promotion should be made solely on the basis of ability and potential in relation to the needs of the job — success and advancement within NAMISITE depends solely on personal ability and work performance.

Technology Use & Confidential Information

Information is a valuable corporate asset. NAMISITE safeguards its own confidential information, and the information entrusted to it by third parties.

Email, internet & company equipment

NAMISITE's information technology resources must be used responsibly and in a manner consistent with this Code and all other guidelines, including those related to specific computer technology, data protection, confidentiality, and intellectual property rights. Unauthorized use of telephones, the mail system or other company equipment is not permitted.

Protecting confidential information

- NAMISITE will safeguard its own confidential information as well as information that suppliers, business partners or customers entrust to it. Unauthorized release of confidential information can cause NAMISITE to lose critical competitive advantage or damage third-party relationships.
- Confidential company information may not be disclosed or distributed, without proper authority, to any unauthorized person inside or outside the company. Non-public information may not be used for the personal profit of the employee or anyone close to them.

Prohibition of insider dealing

It is illegal, and subject to civil and criminal sanction, to trade stocks or other securities of a corporation while in possession of material non-public ("price sensitive") information about it. Employees in possession of such information must not use it to deal in securities, or pass it to third parties, including people close to them.

Media, Environment & Social Responsibility

Only designated spokespeople may comment to the press — and protecting the world we live in is a continuing NAMISITE commitment.

Media relations & public statements

NAMISITE's business activities may be closely monitored by the media and security analysts. Any information given to them could be interpreted as an official NAMISITE response. Comments to the press must be made only by designated spokespeople, or after authorization of the relevant department. No employee shall publish, communicate or broadcast to the media any statement on the company's policies or actions that adversely affects its image, unless factual and made in an official capacity. All external communication is routed only through a designated spokesperson.

Protecting the environment

Protecting the world in which we live is a vital concern and a continuing commitment. NAMISITE aims at continuous performance improvement in safety, health and environmental management.

Corporate social responsibility

NAMISITE acknowledges its socio-political and social responsibilities as a company. This awareness is part of its tradition and its understanding of commercial activity and behaviour toward customers, employees, shareholders and the general public — NAMISITE sees itself not only as a partner of industry and commerce, but as an active member of society.

Accounting Standards & Equal Opportunity

Every account and record must clearly and honestly describe the true nature of the business transaction, asset or liability behind it.

Accounting standards

All accounts and records must be documented in a manner that clearly identifies and describes the true nature of business transactions, assets or liabilities, and properly and timely classifies and records entries in conformity with generally accepted accounting principles. No record, entry or document shall be false, distorted, misleading, misdirected, deliberately incomplete or suppressed. Group funds must not be held outside the group's books of accounts.

Equal opportunities

NAMISITE values the individuality, diversity and creative potential that every man and woman brings to its business. All employees should be treated with equal respect and dignity and provided equality of opportunity to develop themselves and their careers — judgments for recruitment, development and promotion are made solely on ability and job-relevant potential.

Misconduct & Its Consequences

Misconduct is viewed very seriously by NAMISITE — wilful or otherwise, it can attract severe punitive action, including termination of services.

7.3.6 What counts as misconduct

Any of the following acts by an employee shall be deemed misconduct. This list is illustrative, not exhaustive.

- Misuse of access cards (never share your smart card with other associates)
- Negligence or improper conduct leading to damage of company property
- Violation of health, safety or personnel policies, or the Information Security Policy
- Fighting or threatening violence in the workplace
- Wilful insubordination and disobedience of a lawful, reasonable order from a superior
- Theft, fraud or dishonesty involving the employer's business, property or a colleague's property
- Habitual absence from the workplace without necessary prior approval
- Engaging in side trade, or a part-time/full-time business other than the company's
- Disclosing confidential company information to unauthorized people outside the company
- Wilful, serious misrepresentation of information given at the time of applying for employment
- Rude or untoward behaviour toward fellow employees or customers at work or on company duty
- Possessing lethal weapons or firearms, except as permitted by law and the Management
- Accepting gifts from clients, creditors or customers
- Reporting to work under the influence of alcohol, intoxicants or drugs
- Smoking on office premises
- Falsification, defacement or destruction of personal or establishment records
- Continued tardiness, which may invite disciplinary action and/or be settled against Privilege Leave

Everyday workplace discipline

Switch off your machine and other electrical appliances (AC, fans, lights, projectors) when not in use. Mobiles should always be in silent mode in the office, especially during internal and customer meetings.

Outside Activities & Confidentiality

What employees do outside NAMISITE still reflects on the company — political involvement, outside trade and confidentiality all carry clear limits.

7.3.7 Membership of political parties/bodies

- Employees will not take part in, or be involved with, any demonstration — political or otherwise — that involves incitement to an offence.
- No employee shall bring outside influence to bear upon any superior authority to further their own interests in matters pertaining to their service and growth in the company.

7.3.8 Confidentiality & non-disclosure

- No employee shall divulge any business or technical information that comes to their knowledge in the course of employment. This duty of secrecy applies both during employment and thereafter.
- Except when necessary for their duties, employees shall not retain, without prior written consent of Management, any papers, documents, specifications or records relating to the company's business; any such material must be returned on severance of service.
- No employee, unless officially designated, shall communicate any official document or information to anybody internal or external to the company.

7.3.9 Private trade / employment

No employee shall, except with the prior written permission of Management, engage directly or indirectly in any trade or business, or undertake any other employment or consultancy — with or without remuneration — during the course of their employment with the company.

Drugs & Alcohol

The quality of our services depends on unimpaired judgment — use of drugs or alcohol that impairs an individual's ability to perform their job is prohibited.

7.3.10 Policy

- The company and its clients require the highest quality professional services, delivered by individuals with unimpaired judgment. Drug or alcohol use that impairs an individual's ability to arrive at work on time or perform their responsibilities satisfactorily is prohibited.
- Even outside the workplace, illegal drug use — like any other criminal act — reflects badly on the company and its image, and must be avoided at all times. An individual unable to perform satisfactorily due to drug or alcohol use will not be permitted to work or remain on company or client premises.
- The company retains the right to require an individual to submit to a screening test for drugs or alcohol if they appear to be under the influence. Employees found using drugs or alcohol on office premises are liable for action up to and including termination.

Annual reminder

HR will send an annual reminder to all employees on the importance of this Code, together with the document itself.

Read it. Sign it. Live it.

Every new joiner — associate, leader, executive, vendor, partner or freelancer — reads and signs this Code before their joining formalities are complete.

“I have read and understood the ‘Code of Conduct’ Policy of NAMISITE.”

Employee Code: _____

Employee Name: _____

Date: _____

Signature: _____

Published on the Namisite website

This Code is published on the NAMISITE website and linked from every employment, vendor, partner and freelance contract or offer letter — acceptance of that contract is deemed acceptance of this Code, in full.

Integrity first. Respect always.

ONE CODE OF CONDUCT · NAMISITE TECHNOLOGIES



Namisite Technologies Pvt. Ltd.

HR Policy Manual · Code of Conduct

support@namisite.com

+91-926-797-1645