



## ***Code of Conduct Policy***

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THIS DOCUMENT IS INTENDED TO HAVE THE COMPANY CODE OF CONDUCT SPECIFICALLY DEMANDED TO GET ADHERE BY :

ALL NAMISITE COMPANY –

1. Associates
2. Leaders
3. Executives
4. Vendors
5. Partners
6. Freelancers



## 7. Code of Conduct

### Message

It has been and continues to be our policy that NAMISITE and its associated employees / partners / vendors / associates / vendors / freelancers to maintain the highest ethical standards in the conduct of business. I believe that it is timely and appropriate that we produce a statement of Code of Conduct including Business Ethics.

I would like to reiterate to each employee that the Board and I expect complete compliance with these policies.

Proprietor **NAMISITE**

### 7.1 Policy Objective

NAMISITE is committed to highest standards of ethics and our aim is to create a culture of trust, respect and open mindedness both inside and outside the company. NAMISITE requires all its employees to observe the highest standards of integrity and honesty and to act with due skills, care, diligence and fairness in conduct of day to day business. NAMISITE requires all their employees to comply with the laws and regulations of the company and the statute they operate in.

The code of conduct is not exhaustive and can't cover all situations that may arise but the spirit of this is to deter wrong doing and promote and foster a culture of honest, ethical conduct in personal and professional relationships. Thus the objective of the policy is to lay down broad guidelines for the code of conduct for NAMISITE Employees.

### 7.2 Coverage

The policy covers all employees of the company across different departments and locations

### 7.3 Policy Guidelines

#### 7.3.1 Protecting company assets and handling of company's properties

All NAMISITE employees are responsible for protecting NAMISITE's assets including tangible assets such as materials, equipment's and cash as well as intangible assets like computer systems, trade secrets and confidential information. NAMISITE employees have a duty to protect NAMISITE's assets from loss, damage, misuse, theft or sabotage and to 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 compute program. NAMISITE will vigorously defend and protect its own intellectual property

Policy Name

Code of Conduct

Effective Date

AUGUST 17, 2017

**Draft for Approval**

DECEMBER 25, 2017

Modified by

ADMIN

Date of Modification

### Content

- Work Days / Hours
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rights. At the same time it is imperative to respect the rights of others. NAMISITE employees must not knowingly infringe upon the intellectual property rights of others. NAMISITE will have complete right over any intellectual property created as a part of your job, not restricted to patents, processes or any best practices.

### **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 Conflict of Interests**

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

### **7.3.5 Handling gifts or other benefits**

- The company does not espouse the payments or receipts of gifts or bribes for business or financial gain. As a corollary, no employee or representative of the company should do anything that could give an impression that the company could be influenced in this manner.
- When giving or receiving any gifts NAMISITE employees should assess the case along with the following guidelines:
- NAMISITE is strongly committed in its business relations with third parties e.g. suppliers, customers and service providers to the highest standards of ethical conduct and to full compliance with all applicable national and international laws taking into account common cultural and country specific conventions. NAMISITE does not seek to get any advantage through the improper use of offering or accepting gifts, favours entertainment or monetary payments from or to the third parties. Business decisions are based on objective criteria of as competitive price, quality, service as well as the business partner's reliability and integrity. NAMISITE employees avoid situations that are likely to give the impression that decisions are not taken independently, but in the interest of NAMISITE, as its employees are receptive to personal benefits. Superiors are expected to observe the rule by example.

With regard to gifts and benefits of any kind two maxims will apply:

### **Integrity and Transparency**

- Group funds should not be used in payments, direct or indirect, to government officials or employees of state organizations for unlawful or improper purposes. "Payments" is intended to include money and gifts of any other nominal value and entertainment other than on a modest scale.



- Gifts and entertainment only be offered to any third party if they are consistent with customary business practice, modest in value and not in contravention of any applicable law. No such offer should be made if public disclosure of the fact would embarrass the group or the employee.
- No employee should seek or accept a personal gift or entertainment which might reasonably be believed to influence business transactions. Offers of entertainment must not be accepted unless the offer is within the bounds of accepted business hospitality. Unsolicited gifts which do not fall within the acceptable limits should be returned or donated to a reputable charity.
- **Integrity:** Commercial bribery, whether active or passive, is illegal and subject to criminal sanction or disciplinary action. NAMISITE employees may not, under any circumstances, request, give or receive monetary gifts from others. Small non-monetary gifts or other benefits of limited value are nevertheless can be made to accepted as long as it is within the bounds of accepted business hospitality and does not lead to excessive expenditures or obliges the receipt to a service in return.
- **Transparency:** Transparency will also entail that employees of NAMISITE will inform their superior about any of the benefit of whatever nature they have been offered. In addition, if they are unsure of any of the benefits they have planned to give , they have been announced to receive or already have received might not meet the above requirements or the refusal of any gift is likely to embarrass the giving business partner NAMISITE employees should consult their direct superior. The further course of action and conduct is to be agreed with the superior.
- **Respect individual diversity, no discrimination or harassment of any kind:** Mutual respect is a core principal of NAMISITE's corporate culture. All employees shall be treated with equal respect and dignity and shall be provided with equality of opportunity to develop themselves and their careers.
- People working in a cooperative way and focused on 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.
- Please refer to the section of HR Policy on "**Harassment and Discrimination**" and "**Sexual Harassment**" for more details regarding the same. In particular Sexual Harassment will not be tolerated. Any person who believes they have been sexually harassed should report the incidence and circumstances to their immediate manager or HR Department who will arrange for it to be investigated impartially and confidentially
- **Using Email, internet and other communication facilities:** NAMISITE's information technology resources have to be used responsibly and in a manner consistent with the code of conduct and all other guidelines, including those related to specific computer technology, data protection, confidential and proprietary and intellectual property rights
- Unauthorized use of telephones, mail system or other company equipment.
- **Protecting confidential information; prohibition of insider dealing:** Information is a valuable corporate asses, NAMISITE will safeguard its own confidential information as well as the information that third parties like suppliers, business partners or customers entrust to NAMISITE. The unauthorized release of confidential information can cause the company to lose critical competitive advantage or hurt relationships with third parties or fellow employees
- Confidential company information may not be disclosed or distributed without proper authority to any unauthorized person inside and outside the company. Non-public information obtained may not be used for the personal profit of the employee or any person close to him.



- It is illegal and subject to civil and criminal sanctions to take stocks or other securities of a corporation while possessing material non-public information about such corporation. Material non-public “price sensitive” information is any non-public information that could influence a reasonable investor to trade stocks or securities of any affected corporation. NAMISITE employees in possession of confidential “price sensitive” information in relation to securities do not make use of such information to deal in securities or provide such information to third parties including persons close to them.
- **Media relations and public statements:** NAMISITE’s business activities may be monitored closely by the media, such as newspapers, magazines, radio, television, internet media and security analysts. Any information provided to those individuals or groups could well be interpreted as an official NAMISITE response and published as such. In order to provide clear and accurate information to the public, it is vital that comments to the press or reporters to be made only by designated spokespersons or after authorization of the relevant department give the authority to deal with those inquiries
- No employee shall publish/communicate/broadcast to the media any statement on the policies/action of the company which adversely affects the image of the company unless such statements are factual in nature and made in official capacity. All external communication will be routed only through a designated spokesperson identified by the company.
- **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 a part of its tradition and understanding of commercial activities and behaviour when dealing with customers, employees, shareholders and general public. Not only does NAMISITE see itself as a partner of industry and commerce, but also as a part of an active member of the society.
- **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 should be provided with equality of opportunity to develop themselves and their careers.
- **Particular judgments** about people for the purposes of recruitment, development and promotion should be made solely on the basis of a person’s ability and potential in relation to needs of the job and should take into account of any matter not relevant to the performance of the job. Overall, success and advancement within NAMISITE should depend solely on personal ability and work performance.

### 7.3.6 Misconduct and its interpretation

Misconduct is viewed very seriously by NAMISITE and any such action either wilful or otherwise will attract severe punitive action including termination of services where deemed fit.

Any of the following acts on the part of the employee shall be deemed to be misconduct.

- Access cards misuse. (Never share your smart card with other associates)
- Negligence or improper conduct leading to damage of company property.



- Violation of health or safety rules and personnel policies.
- Non-adherence to Information Security Policy.
- Fighting or threatening violence in the workplace.
- Wilful insubordination and disobedience of any lawful and/ or reasonable order of superior.
- Theft, fraud or dishonesty in connection with the employer's business or property within the establishment or theft of another employee's property within the establishment.
- Habitual absence from the place or working without necessary prior approvals.
- Engaging into side trade or taking up any part-time or full-time business other than that of the company.
- Disclosing confidential company specific information, which may come into the possession of the employee in the course of his/her work, to unauthorized personnel/ people outside the company.
- Wilful and serious misrepresentation in the information given by the employee at the time of application for employment.
- Being rude/displaying untoward behaviour towards fellow employees/customers when at work or on company duty.
- Possessing lethal weapons or fire arms except when permitted under the law and with prior permission of the Management.
- Accepting gifts, from clients, creditors, customers.
- Reporting to work under the influence of alcohol/ intoxicants/ drugs.
- Smoking on office premises.
- Falsification, defacement or destruction of personal records or any other record of the establishment.
- Any other act subversive or discipline
- Employees are expected to report to work on time. Continued tardiness on their part in this regard will invite disciplinary action and/or settled against Privilege Leave (PL)
- The above are not exhaustive but only illustrative list of misconduct.
- Switch off your machine and other electrical appliances (AC, Fans, Lights, Projectors, etc) when not in use.
- Mobiles should be always in silent mode when in office, especially during internal and customer meetings.

### **7.3.7 Membership of Political Parties/ Bodies**

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



### 7.3.8 Confidentiality and Non-Disclosure

- No employee shall divulge any business, or technical information which may come to his knowledge in the course of his employment in the Company. The responsibility for maintaining secrecy of confidential information shall apply both during the period of employment and thereafter.
- Employees, except when necessary in the course of their duties, shall not without the prior written consent of Management retain in their private possession, any papers/documents/specifications, records etc. relating to the company's business. Any such material must be returned to the company on severance of their services.
- No employee, unless officially designated, shall communicate any official document or information to any other official within the company or anybody external to the company.

### 7.3.9 Private Trade/ Employment

- No employee shall, except with the prior written permission of the Management, engage either directly or indirectly in any trade or business or undertake any other employment of consultancy or undertake such trade/business/ consultancy etc. on behalf of anyone else, either with or without remuneration, during the course of his employment with the company.

### 7.3.10 Drugs and Alcohol

- The company and its clients require the highest quality professional services delivered by individuals with unimpaired judgment. The quality of our services depends on the successful performance of job responsibilities by each individual in a cost-effective and timely manner. Drug or alcohol use may impair an individual's ability to arrive at work, to be on time, or to perform his or her responsibilities satisfactorily. The use of drugs or alcohol that impairs an individual's ability to perform his or her job is prohibited.
- Even outside the workplace, the illegal use of drugs, just as any other criminal act, reflects badly on the company and its image in the profession and must be avoided at all times. An individual who is unable to satisfactorily perform the work assignment, as a result of 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 the individual appears to be under the influence of either. Employees found using drugs or alcohol in office premises is liable for action up to and including termination.

**Annual Reminder:** HR head will send an annual reminder to all its employees regards the importance of the code of conduct together with a document.

**Signed copy by each employee:** all employees need to read and sign this code of conduct policy as mentioned under. Each new joinee needs to read and sign the code of conduct at the time of completing the joining formalities. **“I have read and understood the ‘Code of Conduct’ Policy of NAMISITE.”**

**Employee Code:**

**Employee Name:**

**Date:**



**NOTE:** *It is a published COC document on the NAMISITE website and it covers the Hyperlink written in the Contract/Offer letter of an Employee/Freelancer/vendor/Associates and hence it is deemed agreed to have the enforcement of the above documented Policy.*