



harnex

enhancing connectivity

CODE OF BUSINESS CONDUCT AND ETHICS POLICY



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This Code of Business Conduct and Ethics policy has been thought as guidelines for all the actions we will carry out as a team member of organization.

Organization is known for its integrity and is committed to its core values. We would like all the team members to remember that our behavior reflects this reputation and those core values in all the actions we will conduct in the organization. The principles set forth in this document describe how team members should act while they are working with us.

Team members are accountable for reading, understanding and adhering to this code. Further, compliance with all laws, rules and regulations related to organization's activities is mandatory and team members' conduct must be such as to avoid even the appearance of impropriety. Failure to do so could result in disciplinary action, up to and including termination of employment.

If team members are uncertain about what to do then he/she shall refer to the relevant section of this Code. If team members are still unsure, speak with immediate supervisor/Manager or HA Enabler. If team member has any doubt then he/she shall ask for help.





WHAT ARE MY RESPONSIBILITIES?

● I follow the Code

Our Code applies equally to all our team members. As a team member, it is important that we should know and follow the Code as a guideline for decision-making that is paired with integrity.

● I lead by Example

No matter what our role is, each one of us is expected to lead when it is a question of ethics and be accountable for our actions. We act with responsibility and integrity in tune with our core values.

● I am the example for my Team

Most often, a Manager is the first person to be contacted about a concern in our work environment. Managers have some specific responsibilities :

- Be a role model of ethical behavior.
- Encourage your team to raise issues and speak up.
- Communicate a positive message about your commitment to ethics and compliance.
- Promote our values, the Code of Conduct and compliance with policies and the law.
- Actively support ethics and compliance awareness and training programs.
- Have open avenues for communication.
- Listen and respond fairly to team members' concerns.
- Find satisfactory & complete solutions to ethical issues.



RESPECTING EACH OTHER

● An equal opportunity workplace

We are an equal opportunity employer and employment decisions are based on merit and business needs. We are committed to following fair employment practices that provide equal opportunities to all team members. We do not discriminate on the basis of race, color, religion, disability, gender, national origin, sexual orientation, gender identity, gender expression, age, genetic information, military status, or any other legally protected status. At our organization, we value diversity and believe that a diverse workplace builds a competitive advantage. discriminate on the basis of race, color, religion, disability, gender, national origin, sexual orientation, gender identity, gender expression, age, genetic information, military status, or any other legally protected status. At our organization, we value diversity and believe that a diverse workplace builds a competitive advantage.

● Safe Place to Work

To work effectively, all of us need a healthy and safe work environment. All forms of substance abuse as well as the use or distribution of drugs, tobacco and alcohol while at work is prohibited. All of us should feel healthy and safe at place of work.





BUSINESS ETHICS

● Preventing Corruption

We should never offer, directly or indirectly, any form of gift, entertainment, commission or anything of value to any Government official, commercial partners including clients or their representatives to:

- Obtain or retain business
- Influence business decisions, or
- Secure an unfair advantage (This includes bribes, kickbacks and facilitation payments)

● Gifts and Entertainment

In connection with certain holidays and other occasions, it is customary in many parts of the society to give gifts of nominal value to clients, government officials and other parties who have a business relationship with the organization. When we give a gift to a client, a government official or any third party, we should keep the following in mind:

- It is not done to obtain or retain business or gain an improper advantage in business
- It is not in the form of cash
- The gift is accurately recorded in the organization's books and records

● Receiving gifts from outsiders

The Management discourages the practices of accepting gifts/favors from outsiders (vendors, suppliers, contractors, financial institutions, clients or associates) in any form.

Occasional inexpensive gifts are allowed to share which helps in relationship building with outsiders. Gifts in the form of Edibles, branded workplace utilizable items (stationary, pen, diary, notepad, mobiles stand, mug, calendars, etc.), company branded merchandise are allowed. Gifts received from outsiders should be informed to management.

All gifts received from outsiders shall be gathered and distributed among all team members. If any team member found accepting gift or the Management learns about the acceptance of it later, the appropriate disciplinary action shall be initiated against the concerned team member up to termination of the team member.



If anyone is giving gifts with the unfaithful intent and/or in expectation of future favours/obligation then team members shall respectfully deny the gifts and such incidences shall be highlighted to management.

Conflict of Interest

Activities of all team members must be lawful and free of conflicts with their responsibilities while working in the organization.

A "conflict of interest" occurs when your private interest interferes in any way with the interests of organization. In addition to avoiding conflicts of interest, you should also avoid even the appearance of a conflict.

All team members must devote their full time and energy in the best interest of the organization.

- A. Outside Employment:** If you take part in any activity that enhances or supports a competitor's position or accept simultaneous employment with any other company/organization/firm or business entity, it is considered outside employment and a conflict of interest.
- B. Working with Family and Friends:** To avoid conflict of interest and any appearance of favoritism, ensure that you do not work directly for, supervise or make employment decisions about a family member and/or friend.
- C. Related Party Transactions:** You should also avoid conducting organization business with a relative or with a business in which a relative is associated in any significant role. Relatives include spouse, siblings, children, parents, grandparents, grandchildren, aunts, uncles, nieces, nephews, cousins, step relationships, and in-laws.
- D. Relationships at Work:** Personal or romantic involvement with a competitor, supplier, or any team member of the organization might affect your ability to exercise good judgment on behalf of the organization. This could lead to conflict of interest. Personal relationships and romantic liaisons between team members who are in a Manager-team member reporting structure may lead to team management challenges and reduced morale. Such relationships must be disclosed to the Manager and HA Enabler immediately, who may take appropriate action as per the demand of the situation.
- E. Outside Directorships:** It is a conflict of interest for team members or directors to serve as a director of any organization that competes with our organization.
- F. Outside Investments:** You should not have a financial interest, including through a relative, in any organization if that interest would give or appear to give you a conflict of interest with our organization. You should be particularly sensitive to financial interests in competitors, suppliers, clients, distributors and strategic partners.



● WHAT SHOULD I DO IF I HAVE ANY QUESTIONS?

All above situations must be disclosed on official email by reaching out to the Human Asset department. Remember, having a conflict of interest situation may not necessarily be wrong however your failure to disclose it will be a violation of this Code.





COMMITTED TO OUR CLIENTS AND STAKEHOLDERS

● Fair Dealings

We must deal fairly with our clients, suppliers, partners, service providers, competitors and anyone else with whom we interact while at work. We should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

● Confidential Information of clients and Third Parties

We have access to significant amounts of client information that may not be available to the public, and we are required to preserve the confidentiality of information obtained in client service. Information of a confidential, private and sensitive nature must be used responsibly and controlled and protected to prevent its prohibited, arbitrary or careless disclosure.

● Confidential Information of clients and Third Parties

At organization, we believe that a free and fair market benefits all of us and ensures that our clients receive the best quality products and services at the best prices. These laws regulate our relationships with our clients.





NOTE

- A.** The matters covered in this Code are of the utmost importance to the organization, its stakeholders and its business partners and are essential to the organization's ability to conduct its business in accordance with its stated values.
- B.** We expect all our team members and associates shall follow the guidelines given in the Code of Conduct.

