

BUSINESS & EMPLOYMENT ETHICS & CONDUCT

Purpose:

With this Code of Conduct, **Netscribes Data & Insights Private Limited and its subsidiaries** would like make sure that all employees are familiarized with **Netscribes Data & Insights Private Limited** and **its subsidiaries** business & employment code of conduct. The code of conduct is a guideline of our existing **climate, principles & philosophy** for running the business. Each employee of **Netscribes Data & Insights Private Limited and its subsidiaries** working on employment, contract, internship or consultant MUST be aware, accept & practice these codes of conduct to carry forward our reputation & values. **Netscribes Data & Insights Private Limited** and **its subsidiaries** work environment thrives on high standards of conduct, transparency & fairness which are set as per this Code of Conduct.

Ethical Conduct:

Successful business operation & reputation of **Netscribes Data & Insights Private Limited** and **its subsidiaries** is built upon **principles of fair dealing & ethical conduct of our employees**. Our reputation for integrity & excellence requires careful observance of spirit & letter of all applicable laws & regulations, as well as a scrupulous regard for the highest standards of conduct & personal integrity.

Continued success of **Netscribes Data & Insights Private Limited** and **its subsidiaries** is dependent upon customers' trust & we are dedicated to preserving that trust. **Netscribes Data & Insights Private Limited** and **its subsidiaries** Employees owe a duty to **Netscribes Data & Insights Private Limited** and **its subsidiaries**, its customers & shareholders to act in a way that will merit the continued trust & confidence of public.

Netscribes Data & Insights Private Limited and **its subsidiaries** will comply with all applicable laws & regulations & expects its directors, officers & employees to conduct business in accordance with the letter, spirit & intent of all relevant laws & to refrain from any illegal, dishonest, or unethical conduct.

In general, use of good judgment based on high ethical principles will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine proper course of action, the matter should be discussed openly with your immediate supervisor & if necessary with HR & / or CEO for advice & consultation.

Compliance with this policy of business ethics & conduct is responsibility of every **Netscribes Data & Insights Private Limited** and **its subsidiaries** employee. Disregarding or failing to comply with this standard of business ethics & conduct could lead to disciplinary action, up to & including possible termination of employment.

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1) REGULATORY COMPLIANCE:

Every employee of **Netscribes Data & Insights Private Limited** and **its subsidiaries** shall, in his/her business conduct, comply with all applicable laws & regulations, both in letter & in spirit, in all the territories in which he/she operates.

2) MAINTAINING PERSONAL & PROFESSIONAL INTEGRITY:

All employees of **Netscribes Data & Insights Private Limited** and **its subsidiaries** must maintain **personal & professional integrity in his/ her work & transactions** related to **Netscribes Data & Insights Private Limited** and **its subsidiaries**, it's customers, employees or business partners. He/ She must ensure that terms of all contracts & terms of business be stated clearly & unambiguously to all the clients & vendors.

3) ILLEGAL CONSIDERATION:

It is unlawful for all employees **to offer or give bribe** for purpose of obtaining or retaining business or obtaining an unfair advantage in any business dealing or transaction. Any employee whether permanent or trainee or contractual found indulging directly or indirectly in any such activity shall be subject to disciplinary action, up to & including termination of employment & legal action even if they do not actually benefit from the deal.

4) SECURITY OF INFORMATION

Netscribes Data & Insights Private Limited and **its subsidiaries** considers its information & infrastructure thereof a valuable corporate asset. To maintain the security of information obtained in the course of work, no employee may engage in any of the following behaviour.

- To let out undisclosed information to third parties (inside & outside of **Netscribes Data & Insights Private Limited** and **its subsidiaries**) without reasonable justification.
- To use information for personal reasons.
- To modify information without reasonable justification.

Such information must be safely kept appropriately & strictly according to the internal rules concerning security.

- Corporate Information: Information concerning **Netscribes Data & Insights Private Limited's** and **its subsidiaries** sales & other activities is an important asset.
- Information Concerning Business Transactions with Customers & Business Partners: Employee is obliged to safely keep information concerning **Netscribes Data & Insights Private Limited's** and **its subsidiaries** customers, service provide & business partners, which is gained in the course of business transactions.
- Information Concerning Employees: Employees are obliged to appropriately safely keep personal information concerning employees & not to use it for any unofficial purpose.

The above concerning corporate information, business transaction, customer information, business partner, employee & other official information which is gained in the course of work needs to be

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carefully handled & may not be disclosed, modify or destroy it without reasonable justification. Use of such information should be for the purpose officially approved.

5) CONFLICT OF INTEREST:

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. Transactions with outside firms must be conducted within a framework established & controlled by the executive level of **Netscribes Data & Insights Private Limited** and **its subsidiaries**. **Business dealings with outside firms should not result in unusual gains for those firms**. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks & other windfalls designed to ultimately benefit the employer, the employee, or both. Promotional plans that could be interpreted to involve unusual gain require specific executive-level approval.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative because of **Netscribes Data & Insights Private Limited** and **its subsidiaries** business dealings. For the purposes of this code of conduct, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage. No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, **if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of Netscribes Data & Insights Private Limited and its subsidiaries** as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which **Netscribes Data & Insights Private Limited** and **its subsidiaries** does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving **Netscribes Data & Insights Private Limited** and **its subsidiaries**.

6) NON-DISCRIMINATION:

Netscribes Data & Insights Private Limited and **its subsidiaries** employees must deal with clients, suppliers, job applicants & other **Netscribes Data & Insights Private Limited** and **its subsidiaries** employees without regard to race, color, religion, sex, national origin, sexual orientation, age, disability, military service or marital status. All business decisions shall be considered on their own merits.

7) SEXUAL HARASSMENT PREVENTION

Netscribes Data & Insights Private Limited and **its subsidiaries** has the utmost respect for every person's right for safe working environment. Thus **Netscribes Data & Insights Private Limited** and **its subsidiaries** has complete compliance towards various acts regarding Sexual Harassment prevention. Any offence in this regards will lead to **Immediate Termination** of employee engaging in any act identified as Sexual harassment in various laws.

8) OUTSIDE EMPLOYMENT:

Employees may not hold outside jobs nor provide "free-lance" services to anyone during

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tenure of employment with *Netscribes Data & Insights Private Limited* and *its subsidiaries*.

In special cases, management may give specific permission to employees on a case to case basis. However, if ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries*** determines that an employee's outside work interferes with performance or the ability to meet the requirements of ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries*** as they are modified from time to time, the employee may be asked to terminate the outside employment if he or she wishes to remain with ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries***.

9) PASSWORD PROTECTION GUARANTY

While working, employee will be handling tools, information or networks that are protected by password. Employee must guarantee protection of password handled by him/ her & must ensure no breach on usage of these tools.

10) GIFTS & ENTERTAINMENT:

In all matters related to gifts & entertainment, it is the responsibility of ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries*** employee to exercise good judgment. Offering or accepting gifts & entertainment is appropriate only if there is specific business purpose & expenses incurred are necessary.

11) PROTECTION OF CORPORATE ASSETS

Any employee of ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries*** may not use facilities, fixtures, funds or information of ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries*** for any purpose other than proper business execution for ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries***. All employees are required to ensure the thorough management of such assets according to the internal regulations of ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries*** in order not to incite loss, leakage, theft & illegal use thereof.

12) CONSTANT DELIVERY EXCELLENCE:

All employees of ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries*** must strive to serve ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries*** & it's customers with excellence by using best of his/ her professional abilities at all times. He/ She must ensure quick & timely response to any query, responsibility or expectation from him/ her by ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries***, its customer or partners.

13) ADHERENCE TO POLICIES:

Every employee of ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries*** must adhere completely & willingly to ***Netscribes Data & Insights Private Limited***'s and ***its subsidiaries*** policies, procedures or processes as applicable at any given time. He/ She must take due care to ensure Safe, Secure & comfortable work environment for all it's employees & business associates including him/ her.

14) RESPONSIBILITY TOWARDS TEAM:

All employees of ***Netscribes Data & Insights Private Limited*** and ***its subsidiaries*** must strive to set an example for everyone else in company through his/ her Innovation, Work discipline,

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Sustained high performance, Initiatives to solve problems & Thought leadership. He/ She must share his/ her professional knowledge & experience with fellow employees for their skill enhancement & be open to learning from their experiences.

Employee may avoid public accusations or criticisms of other employees at any level in **Netscribes Data & Insights Private Limited** and **its subsidiaries**. Address such issues privately with those involved or your supervisor for resolution.

An employee planning to leave **Netscribes Data & Insights Private Limited** and **its subsidiaries** should not directly or indirectly hire, solicit or encourage another employee to leave the employment of **Netscribes Data & Insights Private Limited** and **its subsidiaries**.

15) REPORTING VIOLATION

Every employee of **Netscribes Data & Insights Private Limited** and **its subsidiaries** shall promptly report to the Management any actual or possible violation of the Code or an event he/ she become aware of that could affect the business or reputation of **Netscribes Data & Insights Private Limited** and **its subsidiaries**.

16) Responsibilities of Employees in Management Positions

All employees at senior positions at **Netscribes Data & Insights Private Limited** and **its subsidiaries** shall take the initiative to enforce the follow of code of conduct & strive to maintain their own work disciplines.

17) FAILURE TO FOLLOW CODE: DISCIPLINARY ACTION:

To ensure orderly operations & provide the best possible work environment, **Netscribes Data & Insights Private Limited** and **its subsidiaries** expects employees to follow rules of conduct that will protect the interests & safety of all employees & **Netscribes Data & Insights Private Limited** and **its subsidiaries as a whole**.

It is not possible to list all the forms of behaviour that are considered unacceptable in the workplace. The following are examples of infractions of rules of conduct that may result in disciplinary action, up to & including termination of employment:

- Theft or inappropriate removal or possession of property
- Falsification of timekeeping records
- Working under the influence of alcohol or illegal drugs
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty, or while operating employer-owned vehicles or equipment
- Fighting or threatening violence in the workplace
- Boisterous or disruptive activity in the workplace
- Negligence or improper conduct leading to damage of employer-owned or customer-owned property
- Insubordination or other disrespectful conduct
- Violation of safety or health rules

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Sexual or other unlawful or unwelcome harassment

- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace
- Excessive absenteeism or any absence without notice
- Unauthorized use of telephones, mail system, or other employer-owned equipment
- Unauthorized disclosure of business "secrets" or confidential information
- Violation of personnel policies
- Outside employment e.g., signing-on for another employment without notification & written approval from **Netscribes Data & Insights Private Limited** and **its subsidiaries**.
- Unsatisfactory performance or conduct

Disciplinary action may call for any of four steps – verbal warning, written warning, suspension with or without pay, or termination of employment – depending on the severity of the problem & the number of occurrences. For disciplinary action following steps will normally be followed:

- **First offence may call for a verbal warning**
- **Next offence may be followed by a written warning**
- **Another offence may lead to a suspension**
- **And still another offence may then lead to termination of employment.**

Netscribes Data & Insights Private Limited and **its subsidiaries** recognizes that there are certain types of employee problems that are serious enough to justify either a suspension or in extreme situations

termination of employment without going through the usual progressive discipline steps.

CONFIRMATION & ACCEPTANCE:

I have read & understand the Code of Conduct. I am in complete agreement with all clauses & will ensure to comply & practice them during & after my association with **Netscribes Data & Insights Private Limited** and **its subsidiaries**. I understand that failure to comply with the Code or to respond

truthfully will be a basis for disciplinary or other action, up to & including dismissal.

Employee's Signature _____ Full Name: _____

Date: _____