



CODE OF CONDUCT POLICY

This **Code of Conduct** illustrates expectations and guiding principles for appropriate workplace behavior. All employees are expected to maintain high ethical standards of conduct and to comply fully with applicable laws and governmental regulations. Each employee should read this document carefully with a commitment to uphold these standards. All employees must familiarize themselves with the content and comply with this Code in all of the Group's operations.

1. All employees shall sign a declaration of the Code confirming their review of and compliance with the Code (Annexure 'A'). New employees are also required to sign the declaration when hired
2. **Conflict of Interest:** Employees must avoid any personal, financial or other interest which may be in conflict with their duties and responsibilities to the Group.
3. Any interest which may constitute a conflict of interest must be promptly disclosed to their line Manager/Human Resources Manager.
4. Employees must not accept any external appointment, such as conducting a business, involved in business partnership, without the written permission of the Group Human Resources Manager.
 - 4.1 Employees that are already involved with external business interests are required to complete the 'Statement of Outside Employment and / or Business Interests' Annexure 'B' (Contact HR to obtain this form). Failure to disclose any such interest and obtain the necessary consent will be viewed as a serious disciplinary offence.
5. **Non-discrimination:** All employees must maintain office decorum at all times, ensure everyone is treated with respect and dignity, avoid shouting or using foul language. No employee shall be discriminated against in employment or occupation on the grounds of sex, age, sexual orientation, religion, political opinion, nationality, ethnicity, disease or disability.
6. The Group adopts an open-door policy hence employees may at any time discuss or seek advice on how to proceed with any particular concern/matter with their line manager /General Manager/Human Resources Manager.
7. **Confidentiality & Non-Disclosure:** You shall maintain confidentiality of all information {whether oral, written or electronic (soft copy)} of technical, operational, administrative, economic, planning, business, financial in nature to which you have access during the course of employment and not to use, divulge or communicate any such information to any person or persons or any third party without written approval from the Management during the course of employment or after its termination for any reason whatsoever. Employees must not use information obtained in the course of employment to obtain financial reward or other benefit.
8. The misuse of e-mail, the Internet and the sending of text messages using Group's equipment can have serious consequences (civil or criminal liability) for the Group and individual employees. It is therefore important that the Group minimizes these risks. In general, information delivered electronically must be of an appropriate business nature.

Anil Taurani
Managing Director

Lalit Taurani
Managing Director



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- 8.1 You must not create, view, download, send or forward, in any form and through any means of communication, any inappropriate material or action, such as: illegal, libelous, pornographic, sexually explicit or obscene images, racist images or messages, or other scandalous or playful material. In general, avoid anything that is unethical or malicious or which may infringe copyright or other intellectual property rights. Employees must at all times comply with work regulations and avoid using social media websites during official working hours.
9. Designated employees by virtue of their position and job role will be entitled for cars provided by the Group for business, and private use, within the boundaries of the United Arab Emirates, Employees provided with Company car are expected to keep the vehicle in a clean and tidy condition at all times. This facility can be withdrawn if the job profile of employee changes or if the user violates company car policy i.e misuse of vehicle, fuel etc. In case of those employees who utilize their personal car for official work, will be reimbursed in line with Fuel allowance policy subject to vehicle being driven minimum mileage of 500 km per month for eligibility. Cost covers Fuel and maintenance.
10. **Licensing & Copyright:** The Group respects the conventions associated with the compliance of international copyrights. Unauthorized copies of software must not be made or used neither on the Group's equipment nor on your own equipment whilst being used for the Group's related work
11. **Financial Authority:** In the event that you are granted financial authority on behalf of the Group, you should acquaint yourself fully with the details of your limits and the responsibilities and accountabilities of your actions.
- 11.1 Whilst exercising your financial authority you should ensure that you do not use this authority in the interest of yourself, your spouse and children ("immediate family"), or of companies in which you or your immediate family have interests.
12. **Media & Public Relations:** The Group is committed to open and honest communications while protecting its image. The Group's relationships with the media are conducted exclusively by the Management. Employees must not comment on any aspect of the Group or publicly represent their own opinion as the Group's opinion to the media/public.
13. **Personal Benefits:** Gifts should never be offered or accepted in circumstances where the outcome of a transaction may be influenced by the gift, or give rise to the perception that the transaction may be influenced by the gift.
- 13.1 Employees must not accept any type of compensation or money of any amount from entities with whom the Group does or may do business.
- 13.2 Should you (or any member of your immediate family) receive from or are offered by any customer or any individual or organization doing or seeking to do business with the Group, any personal benefit - which is not a personal benefit as described above - you shall within 24 hours report the fact in writing to Human Resources Manager with a copy to your line manager, by submitting the form "Statement of personal benefits received" (Annexure 'C') – Contact HR to obtain this form.

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14. **Dress Code:** A uniform or dress code establishes a sense of unity or “esprit de corps”. It provides a visible and ongoing reminder that each one is part of a larger team. While we do not wish to limit staff expressions of taste and individuality, we must all be aware that what we wear to work is a reflection of our own professionalism and that of the organization. Work attire should complement an environment that reflects an efficient, orderly, and professionally operated organization.
- 14.1 Business attire is expected in all areas of operation including areas where employees are required to wear specific uniforms by virtue of the nature of their roles and duties. Uniforms should not be worn outside work locations.
- 14.2 Casuals are not allowed on Thursdays
15. It will be considered as a violation of code of conduct if information furnished by prospective employee, at the time of the employment or after, through resume/application form/documents/ testimonials in connection with his/her education or previous employment or medical history is found incorrect or if it is found that the employee has deliberately concealed or suppressed any facts/events or material information including relationship with existing employees, to further the chances of securing the employment with the company. Violation of code of conduct may lead to termination of employment.
16. **Reporting Fraud, Theft & Illegal Activities:** You must at all times be alert and vigilant with respect to fraud, theft, insider dealing, money laundering or any illegal activity. If any such activity comes to your attention you must immediately report the matter to your Manager and the Human Resources Manager. Your manager will arrange for appropriate follow-up action to be taken and your name will be kept confidential. The Group takes a very serious view of those staff who fail to report any such activity and you will be liable to disciplinary action for not complying with this reporting procedure.
17. **Compliance with Group regulations and local Law:** At all times during the course of your employment with the Group you must never knowingly contravene or deliberately ignore the Group’s internal regulations and the spirit or letter of the prevailing laws of the country.



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