

Code of Conduct Policy

Indian Financial Technology & Allied Services
10th Floor, Tower C, Times Square,
Andheri-Kurla Rd, Andheri East, Mumbai - 400059
www.iftas.in

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1 Objective

The purpose of 'Code of Conduct' (hereinafter "Code") is to articulate high standards of honesty, integrity, ethical and law-abiding behavior expected of all employees of IFTAS while also meeting the requirements of external stakeholders and applicable laws.

This Code is illustrative and not exhaustive. The purpose of the Code is to always act as a beacon for all employees. These are guidelines based on universal principles of Human Values and Business Ethics and are in no way prejudiced for or against any ethnic, religious, regional, gender, group/s, etc.

Definitions & Abbreviations

- I. **Employee:** All employees of IFTAS. For the purpose of this policy, employees also includes those On Roll, FTC, Off Roll and Staffing agencies, (Third party), Consultants, deputation and On the Job Freshers.

The definition and nuances around each employment/Engagement type (On - rolls, FTCs, Consultants, Off-rolls, Third Party, Freshers, Interns) should be referred to from the definitions as per the recruitment policy basis which employee is hired.

- II. **Family of Employee:** Includes spouse, children, parents, siblings, or any other person related to any one of these by blood or marriage, irrespective of whether they are dependents or not.

- III. **IFTAS Management:** For the purpose of this policy, CEO and CXOs of IFTAS.

- IV. **Management Committee:** SVPs, CXOs and CEO of IFTAS.

- V. **NRC:** Nomination and Remuneration Committee

3 General Code of Conduct

3.1 Compliance

It is the bounden duty of all the employees of IFTAS to comply in letter and spirit to all rules, regulations, policies, and procedures of IFTAS and of customers during and in course of rendering services or otherwise (e.g., signing on customer's register during entry and exit from client premises).

3.2 Provision of Equal Opportunities

IFTAS respects diversity at work and is committed to provide equal opportunities to all the candidates and employees throughout their employment without any discrimination on the grounds of race, caste, religion, colour, ancestry, marital status, sex, age, nationality, disability, and veteran status.

3.3 Workplace Safety

IFTAS strive to create a work environment free of all forms of discrimination, intimidation, and harassment. IFTAS does not tolerate bullying, abuse or any behavior that interferes with anyone's work or that creates a hostile or uncomfortable work environment. No matter what form harassment takes – whether physical, verbal, or non-verbal, sexual, in person, via email, social media, video or phone call – it is unacceptable. IFTAS is non-tolerant on Sexual Harassment and hence a separate policy has also been defined in this regard.

3.4 Company Records & Information

IFTAS takes the responsibility seriously to protect and safeguard employee personal and sensitive data in accordance with privacy and information security policies and applicable laws. Only authorized employees and third-party vendors are permitted access on a need-to-know basis.

Employees shall not take from Company premises any documents, papers, records, files, computer disks, or any other tangible matters containing Company records, data or files, without the express permission of the employee's supervisor / manager.

3.5 Use of Company Assets

The assets of IFTAS shall not be misused; they shall be employed primarily and judiciously for the purpose of conducting the work for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials, and resources, as well as intangible assets such as information technology and systems, proprietary information, intellectual property, and relationships with customers and suppliers.

Employees shall promptly report the loss, theft or destruction of any confidential information or intellectual property and data of IFTAS to their manager and or HR of IFTAS.

IFTAS reserves the right to access and monitor all messages and files on its system, including information regarding employee internet use, as and when deemed necessary by the persons

authorized by the management and after following the necessary approved process. Users who receive or notice obscene or inappropriate messages are needed to report the same immediately to their reporting manager or the Human Resources Department. The Company will not be responsible for actions of employees deemed illegal with respect to the usage of electronic resources and the concerned person shall be personally liable for the consequences and penalization of the said misuse.

3.6 Conflict of Interest

Employees of IFTAS shall avoid conflicts of interest with IFTAS and in case there is or may be such a conflict, shall be promptly disclosed. A conflict of interest exists where the interests or benefits of one person or entity conflicts with the interests or benefits of the Company. An annual affirmation towards the adherence to this clause of the Code is required to be given by the employee at the beginning of every financial year and as and when conflict of interest arise. Annual Affirmation Format is given in **Annexure I**.

- I. All employees shall keep the interest of IFTAS uppermost in their mind during their tenure with IFTAS.
- II. Conscientiousness, honesty, and integrity are expected from all employees in all their business activities.
- III. All employees shall use their position, power, and knowledge of IFTAS and its business activities for the benefit of IFTAS and shall not use the same for any personal or private advantage which may have an adverse effect on IFTAS.
- IV. Any employee, who directly or indirectly share classified Information about IFTAS to a competitor, supplier, vendor, or customer is by default indulging in a Conflict-of-Interest situation and inviting strict action from IFTAS including suspension, termination of employment, etc.
- V. Employees shall at all times take possible steps to ensure and protect the interest of IFTAS and discharge their duties with utmost devotion, commitment, intelligence and due diligence.

3.7 Political / religious non-alignment

IFTAS or its employees conduct shall preclude any activity that could be interpreted as mutual dependence / favour with any religious / political body or person and shall not offer or give any company funds or property as donations to any political party, candidate, or campaign.

3.8 Dress Code

All employees shall adhere to the dress code policy of IFTAS.

3.9 Punctuality

All employees are expected to maintain the highest degree of punctuality, in all their official conducts at IFTAS, Punctuality Is Non-Negotiable and shall be treated as below level performance at the time of appraisal.

3.10 Drug, Alcohol, Violence & Weapon Abuse

IFTAS employee shall not attend office or any business activities under the influence of liquor, drugs, narcotics, or any other addictive. IFTAS also does not tolerate violence of any kind including intimidation or threat. This shall invite strict action from IFTAS including but not limited to suspension, termination of employment, etc. The possession or use of weapons/ firearms or ammunitions on premises/ while conducting the business is strictly prohibited.

3.11 Proprietary information & Non-Disclosure Agreement

At the time of joining, each employee signs an agreement to protect and hold confidential the company's proprietary information. The agreement remains in effect for as long as an employee work for IFTAS and after leaving IFTAS.

4 Code of Conduct in relation to Colleagues

4.1 Respect towards all

All employees shall be treated with equal levels of respect so that under all circumstances the self-dignity of all employees is maintained. All types of swearing, shouting at each other, speaking at high pitch out of anger or frustration, etc. are not expected from any employee of IFTAS and shall be treated as unprofessional conduct.

5 Code of Conduct in relation to Customers

5.1 Payments, Gifts & Favors

No employee of IFTAS shall accept or permit any member of his family or any other person acting on his behalf, to accept any gift, transport, boarding, lodging or other service or any other pecuniary advantage, lavish or frequent hospitality, etc. not consistent with customary business practice, excessive in value (more than Rs. 5000/-) and / or could be construed as a bribe or pay-off in violation of applicable laws or ethical standards, such that public disclosure could embarrass IFTAS or oneself.

Any such gift received of price more than Rs. 5,000/-, with or without permission of the Head of Department; shall be reported in writing to the respective reporting manager and or HR within three (3) days following receipt thereof.

Sweets, Chocolates, Dry Fruits etc. may be accepted only on festive occasions/new year/special anniversaries in the interest of building positive business relationships. However, it is preferable that such food items if accepted, are received only at the place of work, and shared with colleagues.

5.2 Bribery and Corruption

Bribery is illegal and directly conflicts with the values of IFTAS. The bribery of any individual – government official or otherwise is a serious matter which can lead to sanctions and penalties against our company and individual employees. Any demand for a bribe or attempt to bribe no matter how small must be immediately refused and brought to the notice of the HR.

Employees shall compete fairly in all its markets, within the framework of applicable laws. Towards this end, employees must ensure that they adopt fair Competition Practices in all dealings. This includes the following:

- i. never resort to rigging bids;
- ii. do not share any pricing and other sensitive information;
- iii. do not receive any pricing and other sensitive information of a competitor through unlawful manner;
- iv. only use legitimate means to obtain competitive information;
- v. never comment on competitors' products or services in an inaccurate or untruthful manner;
- vi. never misrepresent or make misleading/untruthful claims about products in the marketplace, etc.

6 Code of Conduct in relation to Public Exposure

6.1 Communicating with the Public and Media

To protect the reputation of IFTAS, it is important that we communicate accurately with the external audiences like media, members of the public, etc. With the rise of social media and social networking sites, it is important to understand that any information shared, becomes public. Employees shall be cautious when discussing company matters in public forums or with anyone outside of IFTAS. As discussed elsewhere in the Code, employees shall never share confidential information with outsiders unless authorized to do so. Information shall be shared with media, public forums, or social networking sites only by personnel who are duly authorized to do so by the Company.

6.2 Personal use of social media & guidelines

IFTAS recognize that social media is an important way for people to communicate and share information and ideas. Many of us keep personal web pages, feed and blogs, observations, and activities. We may also post and maintain personal profiles on social networking sites or participate in IFTAS Groups on such sites. However, when an employee participates on social media, following must be ensured:

- a. Only designated and authorized individuals can post on behalf of IFTAS on social media platforms;
- b. If you mention that you are an employee of IFTAS, be clear that you speak for yourself and do not represent the firm's view;
- c. Ensure all facts regarding the company are accurate and do not share any company related information that is confidential or proprietary;
- d. When posting on social media keep our values in mind and be respectful, professional, and ethical. In today's social media age, the line between professional, personal lives and relationships can become blurry. Inappropriate social media activity may result in disciplinary action when it has an impact on the workplace or negatively reflects our firm. Remember you are accountable for what you post online.

7 Reporting of Non-Compliance of the Code

IFTAS encourages employees to report to their respective manager or HR of IFTAS about suspected violations of the Code and or internal policies. IFTAS shall ensure confidentiality in all the reports made for the same (details are laid down in the Whistle-blower Policy).

Employees shall fully cooperate with authorized investigations (internal and or external). Making false (or misleading) statements to regulators/ auditors/ company representatives during investigations will attract necessary disciplinary actions.

8 Non-compliance to the Code

Any employee, who violates the Code, shall be subject to actions from IFTAS management, depending upon the nature and gravity of such violation(s) on provision of an opportunity of being heard after making employee aware of such violations alleged against the employee. The employee found guilty of misconduct will be liable to any of the following forms of punishment:

- A censure of warning
- Suspension without pay
- Reduction of pay or demotion
- Discharge from duty

9 Publication of the policy

The HR of IFTAS shall ensure that this Code is known to all employees. A copy of the Code shall be uploaded on the internal portal of IFTAS

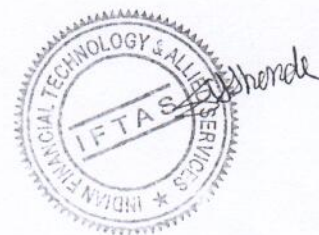
10 Review Process

This policy is duly approved by the IFTAS Board and shall be valid and binding unless modified, amended and/or revised:

The Policy shall be put through a review process in any of the following instances:

- (i) Policy or changes to the provisions of applicable Statute or laws in India
- (ii) Any external triggers like mergers and acquisitions with another entity
- (iii) any other change in working conditions that is likely to impact the said policy.

Notwithstanding any of the above, the policies to be reviewed once in 3 years.



Annual Affirmation – Conflict of Interest

Date:

To
The HR Department
IFTAS <Address>

Dear Sir/Madam,

I have read and understood the 'Code of Conduct' and do hereby confirm that I have not/will not, entered/enter into any material financial and commercial transactions, where I have personal interest, and which may have a potential conflict with the interest of IFTAS at large. I affirm to keep IFTAS informed promptly, should there arise any conflict of interest, failing which would amount to breach of the IFTAS - 'Code of Conduct'.

Yours faithfully,

<Name of the Employee>

<Employee Code>

<Designation & Department>

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