

GENERAL CODE OF CONDUCT FOR FAIR DISCLOSURES

Policy Objective

This Code of Conduct Policy is designed to acquaint all employees of **Ecos (India) Mobility and Hospitality Limited** with the general conduct expected of them while working for the Organization.

The successful business operation and reputation of **Ecos (India) Mobility and Hospitality Limited** is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the letter as well as the spirit of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of ethical conduct and personal integrity.

The continued success of **Ecos (India) Mobility and Hospitality Limited** is dependent upon our customer's and the society's trust and we are dedicated to preserving that trust. Employees owe a duty to **Ecos (India) Mobility and Hospitality Limited**, its customers and the larger society to act in a way that will merit the continued trust and confidence of the public.

The objective of this policy is:

- ▶ To ensure that employees perform their work in an ethical and professional manner.
- ▶ To provide mechanisms to report unethical conduct.
- ▶ To help foster a culture of honesty and accountability.

Policy Scope

This manual is applicable to all employees of **Ecos (India) Mobility and Hospitality Limited**, on the rolls of the Company, across all locations.

▶ Responsibility

HR has the primary responsibility for designing and monitoring implementation of the Code of Conduct Policies. Respective functional heads are jointly responsible for ensuring that the policies are implemented in their true spirit at the respective location.

Policy Guidelines

- ▶ All employees will be required to abide by all the staff rules, regulations, policies and local laws which are in force for the time being, or may be framed from time to time.
- ▶ The employees are required to inculcate the following Official Conduct practices to safeguard the organization's values and never compromise or alter them for any reason.
- ▶ Those employees who violate the policies in this Code will be subjected to disciplinary action, up to and including dismissal from the Organization. If an employee finds him/her in a situation that he/she believes may violate or lead to a violation of this Code, the employee must report the situation to the Appropriate Authority as described above.

General Code of Conduct:

The code of conduct is structured around the following general guidelines which all employees of **Ecos (India) Mobility and Hospitality Limited** must abide by:

- ▶ Employees will be required to abide by all the staff rules, regulations, policies and local laws which are in force for the time being, or may be framed from time to time.
- ▶ Organization values should be safeguarded and never compromised or altered for any reason.
- ▶ High ethical standards should be recognized and valued and any unethical or illegal behavior should be reported by the employees.
- ▶ Employees should conduct themselves in a professional, courteous, modest and respectful manner.
- ▶ Employees should act in the best interest of and fulfil their obligations to the Company.
- ▶ An environment of honesty, trust, and integrity should be maintained.
- ▶ Organization property should be respected and used only for legitimate purposes.
- ▶ In all dealings with agents, investors, service providers, business partners and colleagues, the Code of Conduct should be complied with.
- ▶ Employees should avoid any behavior or cooperative action which harms or could harm the integrity or interests of the Company.
- ▶ Employees should respect the confidentiality of information relating to the affairs of the Company acquired in the course of their service as an employee, except when authorized or legally required to disclose such information.
- ▶ An employee should deal fairly with customers, suppliers, competitors, subordinates and colleagues.

Work Product Ownership:

All employees must be aware that **Ecos (India) Mobility and Hospitality Limited** retains legal ownership of the product of their work.

- ▶ Work product shall be the sole and exclusive property of the **Ecos (India) Mobility and Hospitality Limited**.
- ▶ No work product created while employed by the Company shall be claimed, construed, or presented as individual property, even after employment by the Company has been terminated or the relevant project completed.
- ▶ “Work Products” shall include but shall not be limited to written and electronic documents, system code, any concepts, ideas, or other intellectual property developed for the Company, regardless of whether the intellectual property is actually used by the Company.

On demand by the Company or in the event of separation, the employee shall be required to return all documents, papers, drawings, data records, or computer diskettes, or other property in his/ her possession or control that belongs to the Company or the clients; The employee shall not retain any copies thereafter

▶ Supplying certain other entities with certain types of classified/ confidential information may constitute a conflict of interest.

Conflict of Interest:

Employees are expected to dedicate their best efforts to advancing the company's interests and to making decisions that affect the company based on the company's best interest independent of outside influences.

A potential or actual conflict of interest occurs whenever an employee is in a position to influence a decision that may result in a personal gain for the employee or an immediate family member (i.e., spouse or significant other, children, parents, siblings) as a result of the Company's business dealings.

▶ **A conflict of interest occurs:**

- When an employee takes action or has interests that may make it difficult for him/her to perform his or her work objectively and effectively.
- When an employee receives improper personal benefits for self or for member of an employee's family as a result of his/her position in the company.
- When outside business activity detracts the employee to devote appropriate time and attention to his or her responsibilities in the company.
- On receipt of non-nominal gifts or excessive entertainment from any person/company with which the company has current or prospective business dealings.
- When an employee has any significant ownership/ interest in any supplier, customer, development director or competitor of the company.
- When an employee has a consulting or employment relationship with any supplier, customer, business associate or competitor of the company.

To avoid conflicts of interest the employee must disclose details of all dealings that may have possible conflicts with the interests of the Company so that the Company may assess and prevent the same from arising.

▶ If an employee has any question whether an action or proposed course of conduct would create a conflict of interest, he/she should obtain clarification of the same from his/her immediate superior or from the HR.

Confidentiality:

An employee shall maintain the confidentiality of information of the company or that of any customer, supplier or business associate of the company to which company has a duty to maintain confidentiality, except when disclosure is authorized or legally mandated.

Employees shall maintain confidentiality by:

- ▶ Signing a non-disclosure agreement at the time of joining, to protect the confidential information of the Company. This agreement prohibits employees from disclosing the Company's confidential information to anyone or use it for own advantage or profit, and remains in force for the entire term of employment with the Company.
- ▶ Ensuring safekeeping of all official documents, records or notes in whatever manner (including matter stored in computer memory) for which the employee is responsible.
- ▶ Ensuring safe custody of all files, data, drawings or documents, which are transported outside the office.

Employees will be subject to appropriate disciplinary action for knowingly or unknowingly revealing information of a confidential nature.

Other Occupation:

Employees must abide by the following terms of occupation:

- ▶ An employee must not at any time during the currency of his/her employment directly or indirectly, without the prior consent in writing of his/her immediate superior, engage or interest himself/herself whether for reward or gratuitously in any work or business other than in respect to his/her duties to the Company
- ▶ An employee must also not assume any office, notwithstanding that his/her engagement or interest in such office would not interfere with the performance of his/her duties with the Company, without prior consent in writing of his/her immediate superior.
- ▶ From time to time, employees may be required to work beyond their normal scheduled hours. Employees must perform this work when requested. In cases of conflict with any outside activity, the employee's obligations to the Company must be given priority.
- ▶ Employees will be hired and will continue in the Company's employment with the understanding that the Company is their only employer and that other employment or commercial involvement, which is in conflict with the business interests of the Company, would be strictly prohibited.

Acceptance of Gifts:

All employees and members of their immediate families shall not accept gifts from persons or firms who deal with the Company (including customers, suppliers or competitors), where the gift is being made in order to influence them or where acceptance of the gift may create the appearance of a conflict of interest.

Fair Dealing:

- ▶ An employee shall deal fairly with customers, suppliers, competitors and employees of associates.
- ▶ Employees shall not take unfair advantage of anyone through manipulation, concealment, abuse of confidential, proprietary or trade secret information, misrepresentation of material facts, or any other unfair dealing practices.

Protection and Proper Use of Company Assets:

The Organization's assets and property should be respected and used only for legitimate purposes.

- ▶ All employees shall be expected to use the Company's assets only for legitimate purposes.
- ▶ All employees shall protect the Company's assets and property and ensure its efficient use.
- ▶ Theft, carelessness, waste or damage of the company's assets and property can lead to disciplinary action.
- ▶ Employees shall not use the company letterheads & stationery for personal correspondence or for activities not related to the Company's business.