

## CODE OF CONDUCT

### CONTENTS

1. COMPLIANCE WITH LAWS, RULES AND REGULATIONS .....	2
2. EQUAL OPPORTUNITY/NON-DISCRIMINATION .....	2
3. DRESS CODE .....	2
4. LANGUAGE .....	3
5. HARASSMENT.....	3
6. ALCOHOL AND SUBSTANCE ABUSE.....	4
7. SMOKING .....	5
8. BULLYING .....	5
9. CONFLICTS OF INTEREST .....	6
10. GIFTS .....	6
11. FAIR COMPETITION .....	6
12. CONFIDENTIAL INFORMATION .....	7
13. MESSAGE GUIDELINES .....	7
14. CALL/ MS TEAMS GUIDE LINES .....	8
15. WORK FROM HOME ETTIQUETTES.....	9
16. MONEY LAUNDERING .....	10
17. POLITICAL AND CHARITABLE CONTRIBUTION.....	10
18. RECORD KEEPING .....	11
19. PROTECTION AND PROPER USE OF COMPANY ASSETS .....	11
20. INFORMATION TECHNOLOGY .....	11
22. NO RETALIATION.....	12
23. DISCIPLINARY ACTIONS .....	12
24. ENVIRONMENT, HEALTH AND SAFETY.....	13

## i2e HR i2e Code of Conduct 2023

**PURPOSE:**

This Code Of Conduct is a binding guideline for any employee and summarizes the standard expectation of i2E Consulting Private Limited (hereinafter referred to as i2E/Company) from its employees regarding interpersonal behavior and behavior with any third parties for purpose of work. Our goal is to provide a workplace environment that is comfortable and inclusive for all i2E Personnel.

**SCOPE**

This Code of Conduct shall be applicable to all the employees irrespective of their department, designation, and employment agreement. It shall also be applicable while dealing with any third-party vendors and/or consultants.

**1. COMPLIANCE WITH LAWS, RULES AND REGULATIONS**

i2E Personnel shall meticulously comply with all applicable laws, rules and regulations, in all areas and geographies where the Company operates, both in letter and spirit. Company shall not accept practices which are unlawful or may be damaging to Company's reputation. In order to assist the Company in promoting lawful and ethical behaviour, i2E Personnel must immediately report any possible violation of law, rules, regulation or the Code to HR Department / Management.

**2. EQUAL OPPORTUNITY/NON-DISCRIMINATION**

The Company will not tolerate discrimination based on race, colour, religion, gender, age, national origin, sexual orientation, marital status, disability, deformity, position, creed, physical appearance etc. In case you notice any discrimination, please report the same to HR immediately.

*Points to Remember: On one of the occasions while working late, your manager arranges for Company transport for your lady colleague but due to unavailability of any more company cars, you are requested to book your own cab and proceed. Is this discriminatory? No, the safety of the ladies in the Company is of utmost importance and shall take precedence.*

**3. DRESS CODE**

The Company expects i2E Personnel to dress appropriately in business and professional attire while attending virtual or physical meetings. I2E Personnel should avoid clothing that looks unclean or unprofessional or any attire that may make others uncomfortable like clothing with profane or explicit language statements or clothing that promotes causes that include, but are

## i2e HR i2e Code of Conduct 2023

not limited to, politics, religion, sexuality, race, age, gender, and ethnicity. Clothing with offensive or inappropriate designs or stamps are not allowed. Clothing should not be too revealing.

i2E Personnel should demonstrate good judgment and professional taste. Courtesy towards coworkers and your professional image to coworkers are the factors you need to use to assess whether you are dressing in business attire that is appropriate. More details about the dress code to be adhered are contained in the HR manual.

**4. LANGUAGE**

Every i2E Personnel should respect the language choice of every employee. Any employee should not feel isolated by use of language not known to such employee. The standard language of organisation shall be English and the employees should always use a courteous, polite and dignified language while communicating.

*Points to Remember: Some of the Colleagues are sitting together at pantry or for lunch. Some of them understands only English. In such situations, other colleagues should adopt English as the language of communication so that particular employee do not feel isolated or ignored or cornered.*

**5. HARASSMENT**

i2E Personnel are expected to treat all fellow i2E Personnel, clients, business partners and other stakeholders with dignity and respect at all times. Any type of harassment, including physical, emotional, sexual, verbal or in any other manner whatsoever, is prohibited and can result in disciplinary action against the i2E Personnel leading up to, and including, termination. Any type of sexual harassment to women shall also be separately dealt with by i2E 's POSH policy and the anti harassment policy mentioned in HR Manual.

Harassment can include actions, language, written words or objects that create an intimidating or hostile work environment, such as:

- Speaking with a high-pitched voice with someone
- Physical violence or intimidation
- Unwanted invitations or comments including messaging on social media or instant messaging platforms.
- Physical conduct including assault or unwanted touching
- Passing derogatory comments or ridiculing colleagues;

*Points to Remember: You don't like your colleague and share a difference of opinion on many matters. You must ensure that in any case the debates should be held in a courteous and a dignified manner and no personal comments are made against such employees.*

*Your manager has sent you a work-related email and three attachments with such email. One of the attachments contains objectional content. You can take objection to the same email and report the concerned under this Code of Conduct.*

## 6. ALCOHOL AND SUBSTANCE ABUSE

The use or possession of alcohol, illegal drugs, and other controlled substances during work hours and being under the influence of these substances at a workplace/working from home while on official work is strictly prohibited. However, possession of prescribed medication for medical treatment is permitted. Whenever employees are working, operating any company vehicle or are attending any official workplace or company premises (including parking garages or parking lots), or are conducting related work off-site, they are prohibited from:

- Using, possessing, buying, selling, manufacturing, or dispensing an illegal drug (to include possession of drug paraphernalia).
- Being under the influence of alcohol, marijuana or an illegal drug as defined in this policy.

There may be Company-sponsored events where management approves the serving of alcoholic beverages. In these cases, all appropriate liquor laws must be followed, including laws regarding the prohibition on serving of alcohol to those under the legally permissible age. However, under all such cases, excessive drinking, intoxication and misbehaviour at these events is prohibited and shall be dealt with severely. Drinking and driving is strictly prohibited.

*Points to Remember: One of your colleagues has made a personal choice of not consuming alcohol. You insist to him repeatedly, as a friend, for drinking alcohol at company social event. In such cases, you must remember that i2E Personnel are expected to fully respect others choice of drinking or not drinking alcohol. Any violation can lead to a possible violation of this code of conduct.*

*Company had arranged for a work visit within or outside India and the accommodation for stay is provided by the company. During the course of the visit, a party is organized by the client and your colleagues gets drunk at the party. He enters the accommodation in a drunk state and continues to misbehave by throwing things, speaking loudly or makes any emotional harassment you, but does not actually hit you. You can definitely lodge a complaint for such misbehaviour and violation of Code of Conduct.*

## 7. SMOKING

Smoking is injurious to health and thus Smoking is strictly not permitted inside and around affiliated office buildings, vehicles and offices. Staff, clients and visitors are not permitted to smoke inside the office premises. Smoking shall be permitted only in permitted and designated areas.

Smoking is strictly prohibited on video calls, or in co-working spaces, or in team events or any other spaces that may be designated by i2E for its employees.

## 8. BULLYING

We are committed to ensure that i2E Personnel, our contractors and our customers work in safe and respectful environment that is free of bullying. Bullying may include indulging in any activity, online or offline, that makes the victim uncomfortable in any manner including but not limited to the following activities:

- Spreading false and malicious rumor or gossip;
- Excluding or isolating someone socially with a malafide intention;
- Not co-operating in any manner including cases of withholding necessary information or purposefully giving the wrong information;
- Intimidating someone by communicating in an aggressive manner either physically or by sending aggressive emails;
- Sending offensive jokes or emails to others;
- Criticizing or belittling someone constantly in public and in a repeated manner on the basis of gender, personal preferences, body deformity etc.
- Tampering with a person's personal belongings or work equipment without the consent of such other person;

*Points to Remember: 1) One of your colleagues invites the entire team to a social function at his/her residence. However, you are not invited. This may not necessarily be a case of malafide isolation to you and a personal choice, which should be respected.*

*2) Some of your colleagues are spreading specific false information or rumors about your personal life, relationships. In case these rumours are false, you are required to report the same to HR.*

*3) Your team members repeatedly giving false or untrue information about work such as sending wrong place or venue of meeting or wrong information of the call timings. You may take objection to the same in case of repeat instances and report to the manager.*

## 9. CONFLICTS OF INTEREST

A conflict of interest can occur when a i2E Personnel's personal activities, investments or associations compromises their judgment or ability to act in the Company's best interests. i2E Personnel are strictly not allowed the types of situations that can give rise to conflicts of interest.

It's important for i2E Personnel to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to their manager or the Human Resources Department.

*Points to Remember: If you take part in any activity that enhances or supports a competitor's position or accept simultaneous employment with any other company or business entity, it is considered outside employment and a conflict of interest and action may be taken against you.*

*In case you are involved in any personal relationship with a competitor, supplier, or another employee of the Company, it may affect your ability to exercise good judgment on behalf of the Company. This could lead to conflict of interest, and you should disclose the same to HR in advance.*

## 10. GIFTS

A gift or a favour should never be accepted if by doing so, it creates:

- a sense of obligation, OR
- an unfair advantage to the giver or the acceptor, OR
- A situation that may compromise your judgement.

In case a gift is offered to you, the value of the gift should be considered in the context that if a public disclosure is made regarding the gift, such disclosure will not embarrass you or i2e.

*Points to Remember: - If any gift is given by any third party at meetings conducted for new business, or before a big deal is about to be negotiated then, such gifts should not be accepted. In case a giveaway is given when a seminar or a conference, then it okay to accept such gifts.*

## 11. FAIR COMPETITION

Fair competitions are intended to provide a healthy competition between companies in the market. I2e must make its own decisions and respect the competition from the market. Compliance and adherence to the laws of competition is absolutely essential. Thus, employees must refrain to discuss any of the work aspect with the Competitor and/or its employees, consultants.



## i2e HR i2e Code of Conduct 2023

**Points to Remember:** - A employee of a competitor and you are friends. Occasional discussions about work happen. In such case, it is not correct to divulge business information or business secrets to the friend.

## 12. CONFIDENTIAL INFORMATION

Confidential Information includes vendor information, client information, i2e Technologies, Ventures of i2e, business and marketing plans, etc. Confidential Information should not be leaked or divulged outside the organization and obligations of the Non Disclosure Agreements should be strictly adhered to. I2e is protective of its own confidential information as well as the confidential information of others.

### Do's and Don'ts for Confidential Information

DO's	DONT's
✓ Store in a secure place and should not be left where it can be misplaced.	× Not to be sent to unknown and unauthorized email ids, fax machines
✓ Mark as confidential	× Do not bring any Confidential information of any third party or Information of any Previous employer.
	× Do not carry any Confidential Information of i2e while moving on from the organization.
	× Do not engage in espionage; be transparent in obtaining information about the marketplace

**Points to Remember:** if your former colleague is requesting you to share with him/ her any specific document or requesting you to give information about any employee or employees, you should not release such information to the former colleague and refuse the same. Any such demands should be brought to the notice of your manager or HR.

## 13. MESSAGE GUIDELINES

In this era of virtual world, we are used to instant messaging and texting our colleagues on various applications for eg:- whatsapp, facebook messenger, phone messenger, Instagram, hike etc.

It is important to follow etiquette related to messaging:-

## i2e HR i2e Code of Conduct 2023

Do's	Don'ts
✓ Wish your colleagues on their birthdays, work anniversaries and accomplishments.	× Do not post fake news, hate speech or false information.
✓ Send positive and motivating messages and information.	× Do not post memes or jokes on other professions or people.
✓ Share verified health and fitness related content.	× Do not share information which can be offensive to others.
✓ Share company related news and milestones.	× Do not share content that can spark discussion on politics, religions or personal beliefs.
✓ Keep the conversations in the group strictly professional.	× Never share violent, and discriminatory content against a profession, religion or a region.

Next time when you want to forward a meme, or share noteworthy information, pause, take a moment to review if it is violating our policy.

#### 14. CALL/ MS TEAMS GUIDE LINES

As we move to remote working, the call and virtual meeting guidelines assumes utmost importance in day to day working.

Do's	Don'ts
✓ Set up notifications so you can respond quickly.	× Do not post sensitive information online.
✓ Use emoticons and reactions wisely.	× Do not record unless you have permission.



## i2e HR i2e Code of Conduct 2023

✓ Respect your co-workers' availability status	× Do not recreate teams and meetings.
✓ Remember that tone does not always translate.	× Do not invite too many people.
✓ Keep messages brief and to the point. Join on mute.	× Do not share a link to an online meeting on unrestricted social media posts or platforms.
✓ Use Company's background to reduce distractions.	× Do not be away for a longer time unless your manager knows about your unavailability.
✓ Join Meetings on Time. Switch On the camera for every meeting.	× Teams is not an official platform for any kind of approval.
✓ Reporting managers should be notified in advance if you cannot attend meetings	
✓ Change your availability status only if necessary.	

For more details refer document: HR-0040-POL i2e Virtual Meeting Etiquette Policy 2023 v 0.10

## 15. WORK FROM HOME ETTIQUETTES.

- All employees who are working in a remote mode, are expected to be available and communicative within the stated working hours and are required to strictly adhere to Work from Home policy as stated in HR Manual;
- The working hours shall be defined and stated according to the shift timings of the respective employee. The employee cannot sue moto change the shift or alter the working hours or change in work place. An express permission has to be taken from i2E, alteration in the working hours.
- Employees are expected to work from home in the addresses as registered with i2E. In case employees wish to work from an alternate location, employees shall obtain the permission from the manager/ reporting head and HR at i2e. Mail should be marked to the Reporting Manager, Practice lead and HR (Payroll & Operations team). It shall be at the sole discretion of the Company to grant the permission to such employee without assigning any reasons.
- Company at its own discretion, may ask the employee to attend any meeting, for a particular workday, with or without any prior intimation.
- Ample leaves are provided to an employee for vacation, break from work and maintain balance between work and personal life.

## i2e HR i2e Code of Conduct 2023

- Taking time off for personal well-being is essential for maintaining productivity and overall job satisfaction. By utilizing these leaves, we hope you can recharge, relax, and return to work with renewed energy and enthusiasm.
- As far as possible, reduce interruptions by finding a quiet, distraction-free place to work.
- Ensure you have a reliable internet connection with a sustainable internet pack. Internet Allowance is part of the salary. In case of frequent internet issues, not switching On camera during Team meetings Internet allowance will be discontinued.
- Set working hours that allow you to dedicate your full attention to your work.
- Adhere to the break and attendance schedules set with your manager.
- Coordinate with your manager and other team members to ensure projects are completed effectively.

**16. MONEY LAUNDERING**

The Company complies with anti-money laundering laws. Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin. i2E Personnel must never knowingly facilitate money laundering or terrorist financing and must take steps to prevent inadvertent use of the Company's business activities for these purposes.

i2E Personnel are required to immediately report any unusual or suspicious activities or transactions such as:

- attempted payments in cash or from an unusual financing source
- arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or customer
- unusually complex deals that don't reflect a real business purpose
- attempts to evade record-keeping or reporting requirements

**17. POLITICAL AND CHARITABLE CONTRIBUTION.**

i2e does not make any political statements or contribution. The employees are free to follow their own political interest and make their own contributions. The Company may make charitable contributions to causes and organizations that are not politically affiliated.

*Points to Remember: A national calamity like floods in Kerala has occurred. You want to start a donation drive in the Company to ensure that relief material is sent to the affected people. You must approach HR with all the relevant details and then proceed after obtaining consent from HR.*

## i2e HR i2e Code of Conduct 2023

*You support a national prominent political party and want to recruit members for such party from the Company. This is not permitted, and all such activities shall be carried out by you at your personal level.*

**18. RECORD KEEPING**

All documents, databases, voice messages, mobile device messages, computer documents, files and photos are records. i2e Personnel are required to:

- maintain these records and protect their integrity for as long as required.
- maintain official record keeping systems to retain and file records required for business, legal, financial, research or archival purposes
- dispose of your records according to the Company's records retention and disposition schedule

i2e Personnel should never destroy documents in response to, or in anticipation of, an investigation or audit.

**19. PROTECTION AND PROPER USE OF COMPANY ASSETS**

The Company requires all i2e Personnel to protect its assets. All assets should be used for legitimate purposes, efficiently, and for Company business only. Assets include facilities, equipment, computers and information systems, telephones, mobile phones, networks employee time, confidential and proprietary information, corporate opportunities and Company funds. Suspected incidents of damage to assets, fraud, theft, negligence, and waste should be reported to the HR immediately.

Employees shall adhere to the Assets policy mentioned in the Code of Conduct in addition to the HR manual given to the employee.

**20. INFORMATION TECHNOLOGY**

The Company expects its personnel to help it safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside the Company. Training is provided to all i2e Personnel to ensure compliance with computer security policies. The Company safeguards against inappropriate access by individuals or groups untrained in correct Company policies or procedures.

In addition to the above Information Technology Policy, employees shall adhere to the Information Technology Policy as stated in your appointment letter and HR Manual.

**21. REPORTING/SPEAKING UP**

The organization encourages all employees to ask questions and raise issues without fear of retaliation and is committed to treating reports seriously and investigating them thoroughly.

## i2e HR i2e Code of Conduct 2023

Employees must report suspected fraud, bribery, improper use of company finances or any other unethical, illegal or suspicious behaviour immediately.

To report a concern:

- Talk to your manager
- Make a confidential and/or anonymous report and share with Ms. Reshma Narkar [reshma.narkar@i2econsulting.com](mailto:reshma.narkar@i2econsulting.com)

**22. NO RETALIATION**

Employees who report a concern in good faith cannot be subjected to any adverse employment action including:

- Unfair dismissal, demotion or suspension
- Unfair denial of a promotion, transfer or other employment benefit
- Bullying and harassment, either in person or online
- Exclusionary behavior
- Any other behavior that singles out the person unfairly

The organization does not tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit.

**23. DISCIPLINARY ACTIONS**

If you violate our Code, the Company will take appropriate disciplinary action. The matters covered in this Code are of the utmost importance to the Company, its shareholders and its business partners, and are essential to the Company's ability to conduct its business in accordance with its stated values.

We take violations of this Code, Company policies and applicable laws seriously. Where appropriate, the Company takes prompt corrective action, up to and including termination of employment. Any disciplinary action depends on the nature, severity, and frequency of the violation. Discipline may include a verbal or written warning; suspension with or without pay; loss or reduction of bonus or stock options; or, for the most serious offenses or repeated misconduct, termination of employment.

Corrective action may be taken if you:

- Violate the Code, Company policies and procedures, or applicable laws.
- Direct others to violate the Code, Company policies and procedures, or applicable laws.
- Are aware of a violation or potential violation and fail to report it.

## i2e HR i2e Code of Conduct 2023

- Fail to effectively monitor the actions of people you manage.
- Do not cooperate in a Company audit or investigation.
- Fail to participate in required training.
- Retaliate against someone for reporting a concern in good faith or for participating in an investigation of such a report.
- Disclose information learnt during an internal investigation.

**24. ENVIRONMENT, HEALTH AND SAFETY**

The Company conducts business in accordance with applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures. Applicable safety and health requirements must be communicated to visitors, clients or contractors at any Company location. i2E Personnel are required to immediately report workplace injuries, illnesses, or unsafe conditions, including “near-misses.” The Company is committed to operating in an environmentally responsible manner, from the provision of products and services to the operation of its offices and facilities, selection of vendors and other business activities.

**25. SOCIAL MEDIA POLICY**

Personnel are required to adhere to Social Media Policy and ensure adherence to the below mentioned point and adhere to the Social Media Policy attached to the HR Manuals:

- Clearly state that personal opinions and content on employees' social media accounts are not approved or supported by our company.
- Avoid posting intellectual property and confidential company information on personal social media accounts.
- Avoid discussing company-related information with customers on personal social media accounts.
- Avoid sharing abusive, offensive, and/or slanderous content.
- Adhere to financial disclosure laws.
- Avoid speaking on and/or posting about subjects outside of the company's expertise.
- Reply to all comments in a timely manner.
- Correct or delete incorrect and/or misleading content.
- Adhere to the company's confidentiality agreement and anti-discriminatory policy.
- Avoid posting and/or sharing offensive, discriminatory, and/or false information.

## i2e HR i2e Code of Conduct 2023

**NOTE:-**

The Code does not provide a comprehensive and complete explanation of all expectations from a company standpoint or obligations from a stakeholder standpoint. All Employees are expected to adhere to all the relevant documents issued by the company like the HR manual, employee letters and agreements and the values of the Company, namely:


- A. Customer Commitment - We satisfy and delight our customers - We back our customers - Customer Obsession - Create WOW!
- B. Humility - We respect people - Empathy
- C. Hire & Develop the Best
- D. Embrace Diversity - We celebrate differences. - Inclusion and Diversity - Show RESPECT

Our employees have a continuing obligation to familiarize themselves with all applicable law, advisories and policies, company-level policies, procedures and work rules as relevant. For any guidance on interpretation of the Code, we may seek support. For any query or clarification on the Code, please contact via email at [reshma.narkar@i2econsulting.com](mailto:reshma.narkar@i2econsulting.com)

**Verified By:**

DocuSigned by:  
  
68AB3A2B0578412...  
**Reshma Narkar – Sr Manager – HR**

**Approved By:**

DocuSigned by:  
  
134FB827B8134E0...  
**Vishal Rane – Director**

