



## Ethics Compliance & Code of Conduct

This code of Business Conduct and Ethics contains general guidelines for conducting the business of the Company consistent with highest standards of business ethics. In case of any queries / questions it is the responsibility of the employee to contact the supervisor or the HR Department. All employees are expected to follow and practice the Code in letter and spirit. In case of any non-compliance/non-adherence to the said rules (given below), the company shall not be held responsible for the corrective actions undertaken. Further, this Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. We reserve the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.

### 1. Conflicts of Interest

All employees, officers and directors of FourfrontPvt. Ltd. have a duty of loyalty to the Company, and must therefore avoid any actual or apparent conflict of interest with the Company. A "conflict of interest" exists whenever an individual's private interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of the Company as a whole. A conflict situation can arise when an employee, officer or director takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively. Conflicts of interest may also arise when an employee, officer or director, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company, whether received from the Company or a third party. Loans to, or guarantees of obligations of, employees, officers and directors and their respective family members may create conflicts of interest.

This Code does not attempt to describe all possible conflicts of interest which could develop. Some of the more common conflicts from which directors, officers and employees must refrain, however, are set forth below:

- **Simultaneous Employment.** It is almost always a conflict of interest for a Company employee to work simultaneously for a competitor, customer or supplier. Except with the prior approval of the Board, Company employees are not allowed to work for a competitor as a consultant or board member. The best policy is to avoid any direct or indirect business connection with our customers, suppliers or competitors, except on our behalf.
- **Compensation from Non-Company Sources.** Directors, officers and employees may not accept compensation, in any form, for services performed for the Company from any source other than the Company.
- **Relationship of Company with Third Parties.** Directors, officers and employees may not engage in any conduct or activities that are inconsistent with the Company's best interests or that disrupt or impair the Company's relationship with any person or entity with which the Company has or proposes to enter into a business or contractual relationship.



- **Gifts.** Directors, officers, employees and members of their respective families may not offer, give, or receive gifts from persons or entities who deal with the Company in those cases where any such gift is being made in order to influence such person's actions, or where acceptance of the gift could create the appearance of a conflict of interest.

Conflicts of interest are prohibited as a matter of Company policy.

No employee should obtain any material personal benefits or favours because of his or her position with the Company. However, we do appreciate that receiving of gifts is a common business practice. Appropriate business gifts and entertainment are welcome courtesies designed to build relationships and understanding among business partners. However, gifts and entertainment should not compromise, or appear to compromise, your ability to make objective and fair business decisions. Thus, it is the employees' responsibility to use good judgement in this area. As a general rule, you may receive gifts, not beyond the worth of INR 5000/-, from customers or suppliers only if the gift would not be viewed as an inducement to or reward for any particular business decision

Conflicts of interest may not always be clear-cut, so if you have a question, you must consult with higher levels of management or the Company's legal counsel. Any employee, officer or director who becomes aware of a conflict or potential conflict must immediately bring it to the attention of a supervisor, manager or other appropriate personnel or consult the procedures described in this Code.

2. **Corporate Opportunities** Employees, officers and directors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. Employees, officers and directors are prohibited from (a) taking for themselves personally opportunities that properly belong to the Company or are discovered through the use of corporate property, information or position; (b) using corporate property, information or position for personal gain; and (c) competing with the Company; provided, however, that if the Company's disinterested directors determine that the Company will not pursue an opportunity that relates to the Company's business, a director may do so.
3. **Confidentiality** Employees, officers and directors of the Company must maintain the confidentiality of confidential information entrusted to them by the Company or its suppliers or customers, except when disclosure is authorized by senior management or required by laws, regulations or legal proceedings. Confidential information includes all non-public information that might be of use to competitors of the Company, or harmful to the Company or its customers, if disclosed.
4. **Fair Dealing** Each employee, officer and director shall endeavor to deal fairly with the Company's customers, suppliers, competitors, directors, officers and employees. None shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.



5. **Protection and Proper Use of Company Assets** All employees, officers and directors shall protect the Company's assets and ensure their efficient use. Theft, loss, misuse, carelessness, and waste of assets have a direct impact on the Company's profitability. All Company assets shall be used for legitimate business purposes. The personal use of Company assets without permission is prohibited.
6. **Compliance with Laws, Rules and Regulations** All employees, officers and directors of the Company shall respect and comply with all of the laws, rules and regulations applicable to the Company.
7. **Accounting Practices** It is the policy of the Company to fully and fairly disclose the financial condition of the Company in compliance with all applicable accounting principles, laws, rules and regulations. All books and records of the Company shall be kept in such a way as to fully and fairly reflect all Company transactions.
8. **Document Retention** Directors, officers and employees are expected to become familiar with the Company's policies regarding records retention applicable to them. Records shall always be retained or destroyed according to the Company's record retention policies. In accordance with those policies, in the event of a subpoena, or a pending, imminent or contemplated litigation or governmental investigation, records should not be destroyed.
9. **Reporting Any Illegal or Unethical Behavior** Employees are encouraged to talk to supervisors, managers or other appropriate personnel about observed illegal or unethical behavior. Employees, officers and directors who are concerned that violations of this Code or that other illegal or unethical conduct by employees, officers or directors of the Company have occurred or may occur should either contact their supervisor or superiors. Concerns regarding questionable accounting or auditing matters or internal controls may be communicated, confidentially and anonymously, to the supervisors or the Board of Directors. The Company will not permit retaliation of any kind by or on behalf of the Company and its employees, officers and directors against good faith reports or complaints of violations of this Code or other illegal or unethical conduct.

For all matters and complaints related to Code of Conduct and Ethics compliance, an Ethics Committee has been formulated as below :

1. Ethics Counsellor – Mr. Sundar Raghuram
2. Committee Members – Ms. Anagha Kalay, Mr. Ashish Kalay, Mr. Shrikant Neurgaonkar

#### **Redressal System :**

1. The complaint (written format – letter or email) should be filed with the immediate supervisor / Ethics Committee.
2. The Ethics Committee to review the complaint within 2 working days upon receipt of the same.



3. The Ethics Counsellor to investigate the matter and discuss with the complainant and defendant (jointly or separately as the case maybe) within 4 working days of the receipt of the complaint.
4. The minutes of the meeting to be recorded by one of the committee members.
5. The decision of the Ethics Committee members shall be binding and final.

**10. Penalties for Failure to Comply** Adherence to this Code of Conduct is a condition of employment. Any employee or director who ignores or violates this Code and any supervisor or superior who penalizes a subordinate for attempting in good faith to comply with this Code, including for reporting suspected violations of this Code, will be subject to disciplinary action by the Company as is appropriate under the circumstances, up to and including immediate dismissal.

#### **CHILD LABOUR IS NOT ACCEPTED**

- FOURFRONT does not accept child labour. No person shall be employed at an age younger than 18.
- We acknowledge that according to the UN Convention on the Rights of the Child, a person is a child until the age of 18. We recognize the rights of every child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.

#### **HEALTH AND SAFETY**

##### **Building Safety**

Fourfront ensures to make employees', clients, vendors and suppliers' safety a priority at all times. No hazardous equipment or unsafe buildings are accepted.

##### **Fire Safety**

- Emergency exit and assembly area (as per the current layout) is at the main entrance of the office premises. Evacuation through emergency exits must always be possible during working hours.
- Everyone working on the premises, including managers and guards, must be regularly trained in how to act in case of fire or other emergency. Regular evacuation drills for all employees are required; evacuation plans and firefighting equipment must be in place.

##### **Accidents and First Aid**

Fourfront proactively works to avoid accidents causing harm to any employee in the workplace. Relevant first aid equipment must be made available.

##### **Working Environment**

The premises must be regularly maintained and cleaned and must provide a healthy working environment.