
 <b>SAKSOFT</b> <small>your digital transformation partner</small> <b>SAKSOFT LIMITED</b>	<b>Policy on Ethics and Employee Code of Conduct</b> <b>Department:</b> Human Resources	<b>Doc. No:</b> ESG/CoC/01 <b>Issue 02; Rev. No : 00</b>
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## 1. Purpose

This Code of Conduct sets the ethical standards, values, and behaviors expected from all Saksoft Limited employees. It aims to establish guidelines to ensure professional integrity, protect Saksoft's reputation, and foster a respectful workplace that promotes responsibility and ethical conduct.

## 2. Scope

This policy applies to all Saksoft Limited employees, contractors, consultants, and third-party partners globally. It encompasses behaviour within Saksoft premises, at work-related events, and when representing Saksoft.

## 3. References

- Saksoft Anti-Money Laundering Policy
- Saksoft Anti-Bribery and Corruption Policy
- Saksoft IT Security Policy
- Local and International Regulations on Business Ethics

## 4. Definitions

**Confidential Information:** Information that is proprietary to Saksoft or sensitive in nature, not intended for public disclosure.

**Conflict of Interest:** A situation where an employee's personal interests might interfere with their professional obligations.


**IPR (Intellectual Property Rights):** Intellectual assets created by employees in the course of their duties that belong to the company.

## 5. Roles and Responsibilities

- **Senior Management:** Ensures the Code of Conduct is effectively communicated and adhered to by all employees.
- **HR Team:** Monitors compliance and addresses breaches, conducting investigations as required.
- **Employees:** Adhere to the policy and report violations.

## 6. Policy Statement

Saksoft is dedicated to fostering a workplace that upholds professionalism, respect, and ethical standards. We believe in a culture where all employees feel valued and are encouraged to act with integrity. Every employee is expected to adhere to the company's rules and regulations, including those concerning confidentiality, conflict of interest, and professional conduct. This commitment ensures a positive and productive environment where all team members can contribute to Saksoft's success while upholding our core values and safeguarding the company's reputation.

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## 7. Policy Provisions

### 7.1 No-Smoking Policy

Saksoft is a non-smoking office. Smoking is prohibited on all Saksoft premises, with "No Smoking" signs posted on all floors. Employees are expected to adhere strictly to this policy.

### 7.2 Cell Phone Etiquette

In order to keep the work environment free from disturbances of any kind, cell phones should be on silent mode. However, if work involves constant interaction with customers and other external entities, it may be kept on "Ring" mode, but at a low volume. Any open communication, conference call or group discussions should be conducted in the conference rooms.

### 7.3 External Professional Engagements

Employees may be invited to speak in professional forums or participate in conferences, seminars, and on-line chats and blogs or write in Professional magazines. Under all such circumstances, employees must clarify that the views expressed by them are purely their personal views and do not represent the views of Company. Where official views are required to be expressed, the employee is required to obtain the input and approval of the Executive Director.

### 7.4 Use of Company Resources

Company will provide an employee with access to the Company's resources in the form of work place automation facilities, communication equipment, stationery and vehicles. Employees are expected to display utmost personal integrity in the use of these resources for discharging official responsibilities. Should an employee need any of the above resources given by Company for their personal use, prior approval must be obtained of their Project Manager.

### 7.5 Media Interaction


Employees are not authorized to speak to the press unless permitted. All media inquiries should be directed to the Executive Director, the only spokesperson authorized to represent Saksoft.

### 7.6 Confidentiality

Employees must protect confidential information, including intellectual property, financial data, proprietary processes, and personnel records. Unauthorized disclosure may result in disciplinary action and legal consequences.

The protection of confidential business information and trade secrets is vital to the interests and success of the Company. Such confidential information includes, but is not limited to, the following:

1. Intellectual property rights and moral rights
2. Financial information and marketing strategies
3. Proprietary processes
4. Personnel/ payroll records and
5. Conversations with the competitors associated with the Company

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### 7.7 Email and Internet Usage

Email is intended for business use only. Internet browsing for personal purposes is prohibited. Employees should not distribute chain letters or spam via Saksoft's corporate email, and internet usage may be monitored.

### 7.8 Security and Data Protection

Employees must use security mechanisms and access controls to protect company data. Passwords and login details should be safeguarded, as unauthorized access is considered a violation of discipline.

### 7.9 Non-Compete and Confidentiality Post-Employment

Upon leaving Saksoft, employees are prohibited from working with Saksoft's clients or competitors on similar projects for two years without written consent. Unauthorized use or disclosure of company information after termination is subject to legal action.

### 7.10 Intellectual Property Rights (IPR)

At Saksoft, any invention, improvement, design, or other intellectual property created by employees during their employment, particularly those developed within the scope of their duties or using company resources, is considered the exclusive property of the company. This includes, but is not limited to, new technologies, software, processes, methodologies, and creative designs.

To protect these rights, employees may be required to sign documentation that formally assigns any such intellectual property to Saksoft. This policy ensures that the company's investments in innovation and development are safeguarded and that proprietary knowledge remains with Saksoft, even after an employee's departure. The IPR policy is integral to maintaining Saksoft's competitive advantage, supporting growth, and encouraging innovation within a framework of mutual respect and understanding between the company and its employees.


### 7.11 Conflict of Interest

A conflict of interest arises when an employee's personal interests, relationships, or activities interfere, or appear to interfere, with their ability to act in the best interests of Saksoft. Employees are expected to avoid situations where personal, financial, or other outside interests could compromise, or even appear to compromise, their impartiality, objectivity, or loyalty to the company.

Examples of potential conflicts of interest include, but are not limited to:

- Engaging in business relationships with family members or close friends that could influence business decisions.
- Holding a significant financial interest in a competitor, vendor, or client of Saksoft.
- Accepting gifts, favors, or benefits from clients, suppliers, or other third parties that might affect impartial decision-making.

All employees must disclose any actual or potential conflicts of interest to their manager or the HR Team. Saksoft will review such disclosures and may require the employee to take specific actions to eliminate or manage the conflict. Transparency and ethical decision-making are essential to maintaining trust and integrity within the organization.

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## 8. Monitoring and Evaluation

The HR Team will monitor compliance with the Code through regular assessments, audits, and feedback from employees. Breaches will be handled in accordance with Saksoft's disciplinary policies.

## 9. KPIs for Monitoring Policy Implementation

KPI	Description	Target	Frequency	Responsible Team
Code of Conduct Training Completion	Percentage of employees trained on the Code of Conduct	100% completion	Annually	HR Team
Reported Incidents Resolved	Percentage of reported incidents investigated and resolved	100% resolution	Quarterly	HR Team
Security Violations	Number of data security violations reported	Zero incidents	Quarterly	IT Security Team
Unauthorized Media Interactions	Number of unauthorized media interactions	Zero incidents	Annually	HR Team

## 10. Documentation and Record Keeping

The HR Team will maintain records of training, incidents, and resolutions. These records are stored securely and are accessible only to authorized personnel.

## 11. Distribution List

This Code of Conduct will be distributed to:

- All Saksoft employees
- Contractors and third-party partners
- New hires during the onboarding process

*For questions or concerns regarding the Code of Conduct, please contact the HR Team.*