



CODE OF CONDUCT

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Intent of this policy:

Our Employee Code of Conduct outlines our expectations regarding employees' behavior towards their colleagues, supervisors, and overall organization. We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful, and collaborative environment. We can't cover every single case of conduct, but we trust you to always use your best judgment. Reach out to your manager or HR if you face any issues or have any questions.

Scope:

All regular employees/Part time/Interns of the company regardless of employment agreement or rank.

Policy Elements:

- Respect in the workplace
- Compliance with law
- Protection of Company Property
- Professionalism
- Cyber security and digital devices
- Conflict of interest
- Solicitation and Distribution
- Harassment & Violence
- Workplace safety & Health
- Confidentiality And Data Protection

1. Respect in the workplace: All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment, Slavery or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

2. Compliance with law: All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships, and public image.



3. Protection of Company Property: All employees should treat the company's property, whether material or intangible, with respect and care. Employees:

- Shouldn't misuse **company equipment** or use it frivolously such as transfer/modification/deletion of data present in the assets.
- Should respect all kinds of **incorporeal property**. This includes trademarks, copyright, and other property (information, reports etc.) Employees should use them only to complete their job duties.

Employees should protect company facilities and other material property (e.g., company cars) from damage and vandalism, whenever possible. Additionally, the use of our assets for individual profit or any unlawful, unauthorized personal or unethical purpose is prohibited.

4. Professionalism: All employees must show integrity and professionalism in the workplace:

- **Personal appearance & Cleanliness:** All employees must adhere to personal appearance guidelines. We expect you to be well groomed when coming to work and avoid wearing clothes that are unprofessional (e.g., workout clothes, night clothes, shorts and extended ripped jeans). Employees are also expected to maintain cleanliness around their workstation and also at workplace.
- **Job duties and authority:** All employees should fulfill their job duties with integrity and respect toward customers, stakeholders, and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members considering their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner. We encourage mentoring throughout our company.
- **Absenteeism and tardiness:** Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. But generally, we expect employees to be punctual when coming to and leaving from work. Any leave taken should be informed to Manager & HR and approved by Manager (duly raised and approved in system). Leave informed and not updated in system will be treated as an act of indiscipline and integrity.
- **Collaboration:** Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.
- **Communication:** All employees must be open for communication with their colleagues, supervisors, or team members.



- **Benefits:** We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions, or other benefits our company offers.
- **Policies:** All employees should read and follow our company policies. If they have any questions, they should ask their managers or Human Resources (HR) department.

5. Cyber security and digital devices: We expect you to comply with applicable laws and government guidelines governing social media. When using any form of social media, you must comply with this Code of Conduct. You must not disclose any confidential information about the Company or any of its employees, contractors, or third-party vendors. We do not encourage you to share and being part of any political or social propaganda on behalf of the Company unless specifically asked to do so.

6. Conflict of interest: There can be situations of Conflict of Interest, where there may be fine line between inclination towards personal interest over company interest. This can happen during customer/ partner/ other stakeholder’s engagements. This conflict of interest may arise knowingly or unknowingly, by design or by chance, immediate or later realization, direct or indirect, and mostly benefit of conflict would be direct or indirect and materialistic and/or financial in nature. Such conflict of interest causes compromising situations in action towards such partners/ customers that leads to undue favors.

Such conflict-of-interest situations are considered very serious under Ethical Code of Conduct, and subject to strict actions including immediate termination from job and appropriate legal action.

It is important to be consciously vigil of such situations around. If you experience an ethical dilemma, talk to your manager or HR and we will try to help you resolve it.

We must avoid situations involving an actual or potential conflict of interest so that even the slightest doubt about our integrity is not raised. To avoid conflicts of interest and any appearance of favoritism, ensure that you do not work directly for, supervise, or make employment decisions about a family member. Personal or romantic involvement with a competitor, supplier, or another employee of the Company might affect your ability to exercise good judgment on behalf of the Company. This could lead to a conflict of interest. Personal relationships and romantic liaisons between employees who are in a manager-employee reporting structure may lead to team management challenges and reduced morale. Such relationships must be disclosed to the manager immediately who may take appropriate corrective action. As an employee, you can refer your relatives to work with our company. Here are our only restrictions:

- You must not be involved in a supervisory/reporting relationship with a relative.
- You cannot be transferred, promoted, or hired inside a reporting relationship with a relative.



- You cannot be part of a hiring committee when your relative is interviewed for that position.

7. Solicitation and Distribution: Solicitation is any form of requesting money, support or participation for products, groups, organizations or causes which are unrelated to our company (e.g., religious proselytism, asking for petition signatures.) Distribution means disseminating literature or material for commercial or political purposes.

We don't allow solicitation and distribution by non-employees in our workplace. As an employee, you may solicit from your colleagues only when you want to:

- a. Ask colleagues to help organize events for another employee (e.g., adoption/birth of a child, promotion, retiring.)
- b. Seek support for a cause, charity or fundraising event sponsored, funded, organized or authorized by our company.
- c. Invite colleagues to employee activities for an authorized non-business purpose (e.g. recreation, volunteering.)
- d. Ask colleagues to participate in employment-related activities or groups protected by law (e.g. trade unions.)

In all cases, we ask that you do not disturb or distract colleagues from their work.

8. Harassment & Violence: To build a happy and productive workplace, we need everyone to treat others well and help them feel safe. Each of us should do our part to prevent harassment and workplace violence. Violence in our workplace is a serious form of harassment. It includes physical and sexual assault, destruction of property, threats to harm a person or property and verbal and psychological abuse. We want to avoid those incidents altogether, but we also want to be ready to respond if needed. OAPIL is committed to fair labor practices, including fair wages and reasonable working hours & strictly prohibit all forms of modern slavery, including forced labor, child labor, and human trafficking.

9. Workplace safety & Health: Emergency safety management refers to our plan to deal with sudden catastrophes like fire, floods, earthquakes, or explosions. Our emergency management provisions include:

- Functional smoke alarms and sprinklers that are regularly inspected.
- Technicians (external or internal) available to repair leakages, damages and blackouts quickly.
- Fire extinguishers and other fire protection equipment that are easily accessible.
- An evacuation plan is well described and discussed with team members.
- Fire escapes and safety exits are clearly indicated.



OAPIL is a smoke-free and drug free workplace. You can smoke in [designated smoking areas, balconies, open-air verandas, and outer premises.] Any other area in our workplace (like restrooms, lobby, offices, staircases, warehouses) is strictly smoke-free to protect non-smokers. Setting off fire alarms and causing fires by smoking are serious offenses. Whether you are an employee, contractor or visitor, you must not bring, use, give away or sell any drugs on company premises. If you are caught with illegal drugs or show that you are under the influence of substances, you will face disciplinary action up to and including termination.

10. Internet usage: Our corporate internet connection is primarily for business. But you can occasionally use our connection for personal purposes (with prior approval from your superior/manager/management) as long as they (personal purposes) don't interfere with your job responsibilities. Also, we expect you to temporarily halt personal activities that slow down our internet connection (e.g. uploading photos) if you're asked to.

You **must not** use our internet connection to:

- Download or upload obscene, offensive or illegal material.
- Send confidential information to unauthorized recipients.
- Invade another person's privacy and gain access to sensitive information.
- Download or upload pirated movies, music, material or software.
- Visit potentially dangerous websites that can compromise our network and computers' safety.
- Perform unauthorized or illegal actions, like hacking, fraud or buying/selling illegal goods.

11. Cell phone usage

We allow use of cell phones at work. But we also want to ensure that your devices won't distract you from your work or disrupt our workplace & its decorum. We ask you to follow a few simple rules:

- Use your cell phone in a manner that benefits your work (business calls, productivity apps, calendars.)
- Keep personal calls brief and use an empty meeting room or common area so as not to disturb your colleagues.
- Avoid playing games on your phone or texting excessively.
- Don't use your phone for any reason while driving a company vehicle.
- Don't use your phone to record confidential information and private information/pictures etc
- Don't download or upload inappropriate, illegal or obscene material using our corporate internet connection.
- Clicking any pictures or recording any videos at the office premise during office hours should be done only with the written consent of Management & people involved have been explicitly taken.

Also, you must not use your phone in areas where cell phone use is explicitly prohibited.

12. Corporate email

Email is essential to our work. You should use your company email primarily for work, **Work-related use**. You can use your corporate email for work-related purposes without limitations. For example, you can sign up for newsletters and online services that will help you in your job or



professional growth.

13. Our general expectations

No matter how you use your corporate email, we expect you to avoid:

- Signing up for illegal, unreliable, disreputable, or suspect websites and services.
- Registering for a competitor's services, unless authorized.
- Sending insulting or discriminatory messages and content.
- Forward any email to an unauthorized or personal email address without written permission from the management.

In general, use strong passwords and be vigilant in catching emails that carry malware or phishing attempts. If you are not sure that an email you received is safe.

14. Disclosure of Company Information to Outsiders

The employees need to maintain a high level of maturity and confidentiality in all matters related to the company and its business. All Conversations done between the employees, with the Managers, with the HR, with the Management shall be in confidence only and all such information (however trivial) shall not be disclosed to any outsider or any person who is not authorized to know such information. All such information should never be shared with the ex-employees of the company. Any violation of this clause shall be considered a serious breach of the company's policy and shall invite strictest of actions by the company including initiating legal proceedings (civil & criminal).

15. Confidentiality And Data Protection: It is every employee's obligation, morale responsibility, and duty to protect information and data about company, clients, partners, employees, engagements, contracts, in all respects. These could be employee records, unpublished financial information, business related confidential information/data, and employee compensation.

Non-compete and non-disclosure agreements (NDAs) are part of employment contract. While company will ensure all the needful to implement processes and practices, the employee responsibility is absolute and non-negotiable.

All employee's salary information is confidential and should not be disclosed for any reason, other than as required for appropriate financial reporting purposes. It is expected from employees to keep their wages, benefits, bonuses, and any other form of compensation confidential, and avoid providing or otherwise broadcasting this information with other employees, or with any third-party that does not have a bona fide need to know.

Any unauthorized disclosure of confidential information by employees may impede our ability to effectively compete for talent, may create unnecessary conflict and disputes, and could lead to disciplinary action up to and including termination of employment.



We expect every individual to share their concerns and issues if faced any to discuss with HR on immediate basis without any delay.

16. Anti-Bribery and Corruption

OAPIL mandates the following:

- Prohibit any form of bribery or corruption in business dealings.
- Ensure all transactions are conducted transparently and ethically.
- Report any suspicious activities related to bribery or corruption.

17. Disciplinary Actions

Our Company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our Code of Conduct. Disciplinary actions will vary depending on the violation. Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement, or other unlawful behavior.

18. Violation

Our Company shall have powers to investigate any violations or incidences observed. The Company shall then after thorough investigation will take corrective action on the same.

19. Training

The Company takes the initiative to provide an education and awareness training program once a year. Company's training will constitute a work environment to the Employees so as to benefit the welfare of the workplace.

20. Policy Review

The responsibility of the Code of Conduct lies with the Shareholder Representative and Senior Management. The Code shall be reviewed from time to time for updation thereof. Any variation in the Code or any waivers from the provisions of the Code shall be approved by the Shareholder Representative

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