

# CODE OF CONDUCT POLICY

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### ❖ Purpose

The Employee Code of Conduct outlines standards of personal and professional conduct that all employees must strive to uphold and behave in an ethical and professional manner at all times. The code provides a basis for all employees to maintain a working environment that is productive, positive, enjoyable, safe and free from harassment and discrimination. It will also assist managers in inducting employees into **Infahs Private Limited** and address any circumstances that may arise which conflict with the stated standards and Values.

### ❖ Scope

The Employee Code of Conduct provides clear guidelines and standards for the appropriate behaviour expected of the Company employees.

### ❖ Process

This Code of Conduct provides a framework for appropriate behaviour for all the Company employees where they can address ethical issues, which employees and management:

- conduct themselves towards other employees or colleagues, employee's representatives and their representatives, government authorities and clients;
- perform their duties and obligations
- fulfil the mission, goals and objectives of the Company; and
- Practice fairness and equity.

The Code of Conduct is established on the following organisational values: integrity, honesty, conscientiousness, compassion, courtesy, fairness, and respect. This relies on individuals being responsible for their own professional behaviour within the provisions of this code, the Company policies, legislation and relevant industrial clauses that apply to individual contracts of employment.

Where there is doubt as to the application of the code, or the appropriate course of action to be adopted, employees affected should discuss the matter with their manager.

### ❖ Managers/Supervisors responsibilities

Managers are responsible and accountable for:

- a) undertaking their duties and behaving in a manner that is consistent with the provisions of the Employee Code of Conduct
- b) informing employees in their teams about the Employee Code of Conduct, relevant policies, procedures and minutes
- c) Providing appropriate training and/or performance counselling to ensure the required standard is met.
- d) reporting any departure from the Employee Code of Conduct by themselves or others
- e) Acting consistently and fairly in dealing with behaviour that breaches this code.

### ❖ Employee's responsibilities

All employees have a responsibility to:

- a) Be personally responsible and accountable for their own performance, behaviour and attendance in the workplace
- b) Undertake their duties and behave in a manner that is consistent with the provisions of the Employee Code of Conduct.
- c) Report any departure from the Employee Code of Conduct by themselves, or others
- d) To comply with the Company's policies and procedures
- e) Promote a positive, safe and healthy environment in the conduct of their work

## Personal conduct

### ❖ Attendance and punctuality:

- a) Employees are expected to be punctual and regular in their attendance.
- b) When an employee is unavoidably absent from work due to sickness or any other reason, the employee should telephone their manager (or appropriate delegate) promptly (preferably before their normal starting time) and indicate their likely return to work.
- c) Managers may exercise their responsibility to contact employees who have not contacted them directly within a reasonable timeframe to ascertain the reasons for that individual's absence.

### ❖ Dress and Appearance

The Company is well-recognised and respected and projects a particular image to our clients. Employees must therefore ensure that their appearance is neat, clean and appropriate for their particular area of work. A high standard of personal hygiene is expected at all times.

Where a uniform is provided, it must be worn in accordance with the Company's requirements. When wearing a uniform to and from work, employees are expected to conduct themselves in a responsible and professional manner. The manager is responsible for determining the dress code appropriate to the environment, while the manager can make exceptions for medical purposes.

### ❖ Casual business wear is defined as:

- a) trousers, pants, skirts
- b) modest shirts, blouses, jumpers, cardigans, non-sports jackets
- c) Suits (for women)

#### **I. Casual business wear does not include:**

- a) denim jeans or leggings
- b) any form of sports shoes (including joggers or runners), thongs, slippers or dilapidated footwear
- c) athletic wear
- d) torn or ripped clothing (even if 'designer' tears)
- e) unsuitably revealing clothing (including backless tops or dresses, or garments that reveal the midriff)
- f) any clothing displaying offensive messages, including racist or similar

### ❖ Personal behaviour

Employees are required to undertake their duties in a professional, responsible, conscientious and ethical manner and to act in the best interests of the Company. They are expected to act honestly in all of their duties when dealing with clients, suppliers, contractors and fellow employees.

### ❖ Natural justice, fairness and equity

If an employee is required to investigate complaints against other employees or issues affecting employees, they must act consistently, promptly, fairly and in a timely manner. The principles of natural justice must be maintained in dealing with each investigation.

### ❖ Use of facilities and equipment

Employees should take all possible care when using the Company's property, goods, intellectual property and services and ensure they are used efficiently, carefully and honestly.

Unless permission has been granted by the manager, the Company resources are not to be used for private purposes.

### ❖ Privacy and use of personal and official information

Employees have an obligation to ensure that professional information is secured against loss, misuse or unauthorised access, modification or disclosure.

Employees have a duty to maintain the confidentiality, integrity and security of official information for which they are responsible.

### ❖ Records management

- a) Employees need to be aware of their record-keeping responsibilities and are reminded there is a legal requirement to adhere to proper records management practices and procedures.
- b) All employees must therefore ensure that the Company documents are not placed in unofficial or private filing systems but place such documents in official files.
- c) Employees must not remove documents from official files. They are controlled records and must be complete, up-to-date and capable of providing organisational accountability when officially scrutinised.
- d) Employees must not damage, dispose of, or in any other manner interfere with official documents or files. The destruction of records may only take place in accordance with a disposal and retention schedule, which has been approved by the Chief Executive Officer.

### ❖ Information technology

Employees must not access information that they are not authorised to access or use and must not allow any other person access for any reason. Employees must take all reasonable precautions, including password maintenance and file protection measures, to prevent unauthorised access and have an obligation to maintain the security and confidentiality of the information systems over which they have responsibility or control and that are owned or used by agreement.

### ❖ Conflict of interest

- A. If an employee becomes aware of the potential for conflict of interest, then they must notify their manager of the potential or actual conflict of interest. the Company expects employees to:
  - 1. declare any likely conflict of interest to supervisors; and
  - 2. Avoid any detrimental outcome as a result of a conflict of interest.
- B. If a conflict of interest arises where an employee:

1. engages or is likely to engage in activities or advances, or
2. Is likely to advance personal or other interests at the expense of the Company's interests or the interests of other employees, the Company may then intervene.
- C. Employees must ensure that there is no conflict or incompatibility between their personal interests, whether pecuniary (e.g. money) or non-pecuniary and the impartial fulfilment of their duties. It is not possible to define all potential areas of conflict of interest, but a number of situations are mentioned below.
  1. Gifts and hospitality are offered where there is an expectation of a return favour (which may or may not be to the detriment of the Company).
  2. additional employment that prevents or hinders the performance of a person in their role
  3. decisions regarding the employment or promotion of relatives or friends
  4. promotion of or soliciting for clients for own private business
- D. If an employee is in doubt as to whether a conflict exists, they must contact their manager. Wherever possible, employees should disqualify themselves from situations of conflict of interest.
- E. Where an employee has an impartiality, financial or proximity interest in any matter regarding provisions outlined within this code or which might be perceived as being in conflict with the interest of another person who may be affected, then the employee must immediately disclose this to the Chief Executive Officer or at the meeting if prior disclosure is not possible.

#### ❖ Financial interests

Employees should avoid any financial involvement or undertaking that could directly or indirectly compromise or undermine the performance of their duties or the Company's objectives or activities.

Financial conflict of interest may arise where an employee, who has a financial interest in a company or other business, is in a position to influence contracts or transactions between the Company and that business. This conflict may extend to any business undertaking in which employees and their immediate families of the employees are acting in direct competition with the Company's activities or interests for personal gain.

#### ❖ Acceptance of commissions, gifts or benefits

Employees should not accept a gift, secret commission or a benefit from a person or organisation outside the Company if the intent of the gift or the benefit is to induce the employee to waive or reduce requirements or to extend a financial or other benefits to a person or organisation outside the Company to the detriment of the Company interests.

As a general rule, no employee should accept a gift or benefit if it could be seen as intended or likely to cause that person to:

- a) perform their job in a particular way, which the person would not normally do, or
- b) Deviate from the proper or usual course of duty.

Employees may accept token gifts or benefits in the circumstances approved by the Chief Executive Officer or a nominee, provided that there is no possibility that the employee might be perceived to be, compromised in the process. Gifts of a nominal value are generally used for promotional purposes by the donor, or moderate acts of hospitality may be accepted by employees. The employee must advise their manager of any gifts and benefits they have received as soon as the gift or benefit is received and must not take advantage or seek to take advantage of their position to obtain a benefit, either for themselves or for someone else.

❖ **Influence to secure advantage**

No employee shall elicit the improper influence or interest of any person to obtain promotion, transfer or other advantages.

❖ **Use of official information**

While employees can contribute to the public debate on social issues, there are some circumstances in which public comment is inappropriate. Public comment by employees should not imply that the comment, although made in a private capacity, is in some way an official comment by the Company. The employee may only disclose official information, with due regard to confidentiality, in order that it is in their official capacity and duties.

An employee can disclose confidential or restricted information or documents acquired in the course of their employment only when required to do so by law, in the course of their duty, when called to give evidence in court, or when proper authority has been given. Approval to release confidential information on employees should be sought from the Chief Executive Officer.

Employees acting in honorary capacities may be asked by third parties to make comments on the Company policy or procedure, and in such cases, employees should confine comments to factual information. Where employees are privy to information of a restricted nature, which may compromise the position of the Company or infringe on the privacy of members of the Company, the information should not be divulged.

❖ **Employee/client boundaries**

The term 'employee/client boundaries' identifies the importance of the trust inherent in the relationship between employees and their clients; however, breaching employee/client boundaries is going outside the limits of the employee/client relationship.

Employees are expected to maintain proper boundaries with clients. Employees are expected to make themselves aware of any workplace and/or program-specific policies/guidelines in this area.

❖ **Relatives and close friends**

A conflict of interest may arise when an employee makes or participates in decisions affecting another person with whom they have a personal relationship (such as a relative, spouse, close friend or personal associate).

In cases where a conflict may arise, employees must advise their manager; wherever possible, employees should disqualify themselves from dealing with those persons in such situations.

### ❖ Personal and professional behaviour

Employees should perform the duties associated with their position to the best of their ability, diligently, impartially and conscientiously. In the performance of their duties, employees should:

- a) comply with legislative and industrial obligations and administrative policies
- b) strive to keep up to date with advances and changes in the knowledge and the professional and ethical standards relevant to their areas and expertise,
- c) maintain adequate documents to support decisions made,
- d) treat all persons with courtesy and sensitivity to their rights and provide all necessary and appropriate assistance
- e) Not take or seek to take improper advantage of any official information gained in the employment with the Company.
- f) not harass or discriminate against employees or in work practices on the grounds of sex, pregnancy, race (including colour, ethnic background or national identity), marital status, disability, sexual preference, political or religious belief, or age
- g) Act responsibly when becoming aware of any unethical behaviour or wrongdoing by any employee. Such information should be forwarded to the CEO
- h) Continuously improve work performance. All employees should actively pursue quality improvements
- i) and not make disparaging remarks about other employees

### ❖ Alcohol and substance abuse or misuse

Employees must ensure that the safety and health of other employees, volunteers and clients are not endangered by any misuse. The Company expects employees to perform their jobs with skill, care and diligence. Employees should not perform any act or omission that is likely to have a detrimental effect on their work performance and that of other employees and clients. Accordingly, employees should not be under the influence of alcohol or other substances while they are at work or at work functions.

Possession, use or trafficking in illegal drugs on the premises is not permitted. The Company premises include but are not limited to all buildings, vehicles, car parks, meeting rooms, and open spaces. Any such activity will be immediately referred to the police, and the Company may take disciplinary action, which may include termination of employment.

Employees must notify the manager if the taking of, or failure to take, prescribed medication is likely to affect their performance and/or affect the safety of any person at the workplace. This is to ensure workplace safety is not jeopardised and that any performance impact is properly managed. It is the responsibility of employees to follow the directions/precautions for any drugs prescribed by a health professional for individual use and/or commercially available preparations that may impact their capacity.

### ❖ Smoking

Passive smoking can impact other employees and the community and create a poor image of the Company, which does not promote or encourage smoking. Smoking is not permitted in the Company owned or leased vehicles or buildings.

Employees may only smoke in their own time during authorised breaks as set out in the award, agreement or employment contract and/or as authorised individually by their manager.



### ❖ Policies

Employees are responsible for carrying out and complying with the Company policies and procedures and legislation. It is acknowledged that employee views on particular matters may differ from those of the Company. However, such views must not either interfere with the performance of an employee's duty or prevent the employee from supporting the Company's objectives.

### ❖ Compliance with lawful instructions

Employees must comply with any lawful instruction given by any person having authority to make or give such an instruction.

### ❖ Bullying

Bullying is unreasonable behaviour that is directed against an individual or group by another individual or group and is derived from the misuse of power over the target of the behaviour. This may include:

- a) verbal abuse, shouting
- b) excluding or isolating behaviour
- c) deliberately withholding information vital for effective work performance
- d) giving employees impossible assignments
- e) physical abuse

Bullying is unacceptable conduct within the Company, and all reported incidents will be investigated.

Whilst it is the responsibility of all employees within the Company to ensure that premises and facilities are free from harassment, managers have a particular and clear responsibility to meet this requirement. Managers who become aware of serious breaches of policy must immediately notify their manager or the CEO.

### ❖ Discrimination and Equal Employment Opportunity (EEO)

Anti-discrimination laws provide guidelines on respecting personal differences. Treating people differently on the basis of personal characteristics is unlawful. The following are examples of attributes: age, industrial activity, parental status, political belief, personal association, race, ethnic background, carer status, marital status, pregnancy/potential, lawful sexual activity, unrelated criminal record, impairment, religious belief/activity, physical features, gender identity, disability and sex.

Discrimination is unacceptable conduct within the Company, and all reported incidents will be investigated.

### ❖ Harassment

Harassment is any type of behaviour that:

- a) the other person does not want and does not return
- b) offends, embarrasses, or scares them, and may be either sexual or non-sexual in nature
- c) targets them because of their race, sex, pregnancy, or other protected attributes under the law

- d) constitutes a form of bullying
- e) Harassment does not have to be a series of incidents or an ongoing pattern of behaviour. Neither does harassment need to be intentional to attract disciplinary action. Harassment can occur in any work-related context, including:
  - 1) Social functions
  - 2) Conferences
  - 3) Office social gatherings
  - 4) Business trips

Harassment and discrimination form part of a continuum of unacceptable behaviour that can include sexual assault, stalking and harassing phone calls, some of which are also against criminal law, which means the police may prosecute anyone who commits such acts.

Fair discipline, performance counselling, or workplace control practices based only on performance issues do not, in themselves, constitute harassment.

#### ❖ Racial and religious vilification

Racial and religious vilification is conduct that incites hatred against, serious contempt for, revulsion or severe ridicule against a person or group on the grounds of racial identification or religious belief or activity. Racial and religious vilification is a form of harassment and discrimination and is unacceptable conduct in the Company. All reported incidents will be investigated.

#### ❖ Occupational safety and health (OSH)

The Company is committed to providing a safe and healthy workplace for all employees and visitors; however, employees have a responsibility to make the workplace a safe and healthy place for all concerned, as far as reasonably practical.

It is therefore important that employees are familiar with the standards or procedures in their particular area of work. If employees have not been advised of these standards or procedures during the induction process, they must, as a matter of urgency, ask their immediate manager to obtain the necessary information.

All employees are responsible for knowing and complying with the OSH rules and guidelines

- a) working so as not to endanger themselves or any other person by any act or omission
- b) use and follow OSH instructions, training or other information
- c) report all incidents, accidents, injuries and hazards to management for action

#### ❖ Professional development

Employees must continually strive to improve their professional competence, maintain their knowledge and encourage the development of their skills and competence of associates.

❖ **Breaches of the Code**

The Company is committed to the standards set out in the Employee Code of Conduct. Where a breach of the code has been identified by the Company, a response to the breach may result in:

- a) Counselling
- b) Disciplinary action
- c) Termination of employment
- d) Suspension
- e) Laying of civil or criminal charge

**Thanks,**

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