

Code of Conduct of Employment

AABHYASA expects you to maintain high moral and ethical standards. These standards are characterized by honesty, fairness, equity in interpersonal and professional relationships as well as in our day-to-day activities. AABHYASA employees are supposed to inform in case, if he deviates from the above standard. (Or if any case is filed against him).

You shall not engage yourself in any business activity. Further, if you directly or indirectly recommend any of your friends/relatives for any business dealing with AABHYASA, you must disclose the nature of such relationships and transactions beforehand.

(1) Integrity

(a) **Introduction**

Our reputation as a company that our users can trust is our most valuable asset, and it is up to all of us to make sure that we continually earn that trust. All of our communications and other interactions with our users should increase their trust in us.

(b) **Dress Code**

AABHYASA expects you to follow a dress code which helps you to work comfortably at the workplace and at the same time project a professional image to our customers, potential employees and the community we are a part of. Hence, it is essential that you take pride in your appearance and maintain proper dress code and general appearance during office hours. You are expected to dress neatly and in a manner consistent with the nature of the work performed.

(c) **Environment, Health & Safety**

Environment, Health, Safety and Laws of the land - You shall adhere to the laws of the land - wherever they are - and shall not violate, cause or any action that impacts the Environment and the Health and Safety of AABHYASA Employees, Customers and at the Community at large.

Substance Abuse - To meet our responsibilities to you, Customers and Investors, the company shall maintain a healthy and productive work environment. Misusing controlled substances or selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs and alcohol on the job is absolutely prohibited.

(d) **Threats and Physical Violence**

You shall not use threatening words, or assault or commit acts of violence or possess weapons, firearms, ammunition, explosives or incendiary devices in the workplace, on work premises or in work vehicles or elsewhere.

The list of behaviors, while not inclusive, provides examples of conduct that is prohibited by this policy:

(e) **Causing physical injury**

Making threatening remarks

Aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress

Intentionally damaging employer property or property of another employee

Committing acts motivated by or related to sexual harassment or domestic violence.

No Smoking - Smoking is strictly prohibited in the premises of the workplace. Appropriate actions shall be initiated against any person found contravening with the policy of this code.

(f) **Disciplinary Actions**

All employees covered under this Code of Employment Conduct and Ethics are required to adhere to the principles and rules laid down in this code. Failure to do so will attract appropriate action including disciplinary action against the employee who is found to violate these principles.

Disciplinary action may include immediate separation of employment or any other action as deemed fit at the Company's sole discretion.

The Company will recover any loss suffered by it due to violation of the provisions of this code by any employee.

Disciplinary Proceedings against the delinquent employee shall be conducted in accordance with the principles of natural justice.

(2) Technology

Safeguarding computer resources is critical because the Company relies on technology to conduct daily business. Software is provided to enable you to perform your job and is covered by federal copyright laws. You cannot duplicate, distribute or lend software to anyone unless permitted by the license agreement.

Company provides electronic mail (e-mail) and Internet access to assist and facilitate business communications. All information stored, transmitted, received, or contained in these systems is the Company's sole property and is subject to its review at any time. All e-mail and Internet use must be consistent with Company's policies, practices and commitment to ensuring a work environment where all persons are treated with respect and dignity. Because these systems provide access to a worldwide audience, you should act at all times as if you are representing Company to the public, and should preserve Company's system security and protect its name and trademarks.

You must act responsibly and adhere to all laws and Company policies when using e-mail or the Internet.

(3) Confidentiality

Company is committed to preserving customer and employee trust. All information, whether it is business, customer or employee-related, must be treated in a confidential manner, and disclosing it is limited to those people who have an appropriate business or legal reason to have access to the information. You need to take special precautions when transmitting information via e-mail, fax, the Internet or other media. Remember to treat all such communications as if they were public documents and printed on letterhead.

In addition, Company meetings are confidential. You may not use audio or video equipment to record these meetings without the specific prior authorization of the head of your department.

You & your families shall not derive any benefit or assist others to derive any benefit from the access to the insider information about the Group, including information which is not available publicly.

Confidentiality is the protection of personal information. Confidentiality means keeping a client's information between you and the client, and not telling others including co-workers, friends, family, etc. so:

- (i) No misbehavior or any other irrelevant behavior or activity with clients is prohibited, this leads to termination.
- (ii) No business of similar or closely related nature should be carried out with client's/company business data in any manner.
- (iii) No disclosure of client's personal information and data to neither outside of company nor to family members or co-workers.

(4) Past Records

This letter of appointment is based on the information furnished in your application for employment and during the interviews you had with us. If any declaration given, or information furnished by you, to the company proves to be false, or if you are found to have willfully suppressed any material information, in such cases, you will be liable to removal from service without prior notice.

Employee must not have any Criminal Record or any criminal activity in their past if company found anything like this, that leads to termination.

(5) In the Workplace

Company is committed to providing a diverse and inclusive work environment, free of all forms of unlawful discrimination, including any type of harassment.

(a) Respect

The Company's greatest strength lies in the talent and ability of its associates. Since working in partnership is vital to the Company's continued success, mutual respect must be the basis for all work relationships. Engaging in behavior that ridicules, belittles, intimidates, threatens or demeans, affects productivity, can negatively impact the Company's reputation. You are expected to treat others with the same respect and dignity that any reasonable person may wish to receive, creating a work environment that is inclusive, supportive and free of harassment and unlawful discrimination.

(b) Equal Employment Opportunity

The talents and skills needed to conduct business successfully are not limited to any particular group of people. Company has a long-standing commitment to a meaningful policy of equal employment opportunity. The Company's policy is to ensure equal employment and advancement opportunity for all qualified individuals without distinction or discrimination because of race, color, religion, gender, sexual orientation, age, national origin, disability, covered veteran status, marital status or any other unlawful basis. As part of this commitment, the Company will make reasonable accommodations for applicants and qualified employees.

(c) Sexual Harassment and Other Discriminatory Harassment

Sexual harassment and other discriminatory harassment are illegal and violate Company policies. Actions or words of a sexual nature that harass or intimidate others are prohibited. Similarly, actions or words that harass or intimidate based on race, color, religion, gender, sexual orientation, age, national origin, disability, covered veteran status, marital status or any other unlawful basis are also prohibited.

(d) Second Job

Unless the Company otherwise consents in its sole discretion, you will devote your entire resources and full and undivided attention exclusively to the business of the Company during the term of your employment with the Company and shall not accept any other employment or engagement (honorary or otherwise).

(e) Unethical Transaction

You shall not assist in the misuse of Company funds, irrespective of the amount involved, including, the misappropriation of such funds for her/his personal benefit, or customers.

All payment and transfers of premium and other items of value shall be made openly and must be disclosed and duly authorized by the concerned authority.

(f) Drugs and Alcohol

Our position on substance abuse is simple: It is incompatible with the health and safety of our employees, and we don't permit it. Consumption of alcohol is banned at our offices, illegal drugs in our offices are strictly prohibited.

(g) Safe Workplace

We are committed to a violence-free work environment, and we will not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should anyone bring a weapon to work. If you become aware of a violation of this policy, you should report it to Human Resources immediately.

(h) Conflict of interest

When you are experiencing a conflict of interest, your personal goals are no longer aligned with your responsibilities towards us. For example, owning stocks of one of our competitors is a conflict of interest.

In other cases, you may be faced with an ethical issue. For example, accepting a bribe may benefit you financially, but it is illegal and against our business code of ethics. If we become aware of such behaviour, you will lose your job and may face legal trouble.

For this reason, conflicts of interest are a serious issue for all of us. We expect you to be vigilant to spot circumstances that create conflicts of interest, either to yourself or for your direct reports. Follow our policies and always act in our company's best interests. Whenever possible, do not let personal or financial interests get in the way of your job. If you are experiencing an ethical dilemma, talk to your manager or HR and we will try to help you resolve it.

(i) Friendships at work

Employees who work together may naturally form friendships either in or outside of the workplace. We encourage this relationship between peers, as it can help you communicate and collaborate. But, we expect you to focus on your work and keep personal disputes outside of our workplace.

(6) Conclusion

Aabhyasa aspires to be a different kind of company. It's impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another's good judgment to uphold a high standard of integrity for ourselves and our company. We expect all employees to be guided by both the letter and the spirit of this Code. Sometimes, identifying the right thing to do isn't an easy call. If you aren't sure, don't be afraid to ask questions of your manager, Legal or Ethics & Compliance.

And remember... don't be evil, and if you see something that you think isn't right – speak up!