

## CODE OF CONDUCT

Every employee is liable to abide by various rules and regulations instituted by the management. Non-compliance is considered as breach of discipline and may result in imposition of a penalty (major/minor) depending upon the extent of the breach of the disciplinary regulation.

The significant aspects of the applicable Code of Conduct is listed below:

1. Any information relating to following areas is termed as confidential:
  - Operations
  - Award of contracts/assignments
  - Participation in consortiums, underwriting arrangements etc.
  - Insider information on companies/stock market etc.
  - Financial matters
2. Employee must not disclose, knowingly or carelessly, any information relating to these areas without prior approval from their respective head of the department. In official discussions with existing and prospective clients, care must be taken to provide information only on a need-to-know basis.
3. On cessation of employment, employee must return all official files, documents of every description including computer based documents to the respective supervisor.
4. Employee is required to obtain proper approval before proceeding on leave. Similarly, if in case, an employee needs to extend the leave for reasons beyond control, proper notification must be submitted by the employee to the relevant departmental head and the Human Resource Department. Leave Applications must be routed according to the procedure stated in the Leave Policy.
5. An employee must seek prior written consent of his or her superior designate before releasing any information, obtained during the course of his or her employment, to all outside agencies.
6. Employee is advised to exercise own discretion in accepting gifts, invitations to lunch or dinners and other forms of entertainment etc. which could implicitly influence the decision of a transaction.
7. For purposes of security and identification, employee must display the company identity Cards at all times within the company premises.
8. Official visitors must be escorted by the relevant employee to the meeting area.
9. Personal/social visits during working hours are discouraged. In case of an emergency, visitors must be entertained outside the office/work area or in the designated reception area to ensure minimum disruption to others as well as to maintain confidentiality of information.
10. Employees must immediately inform Human Resource Department in writing regarding any change in relevant personal information.
11. The following list various actions by an employee which may be considered as breach of discipline and conduct rules:
  - Non-conformity to code of conduct as described above.
  - Theft/fraud/forgery or intentional misuse of office equipment or assets.
  - Misuse of medical entitlement by extending it to family members not covered under the scope of medical coverage.
  - Registering proxy attendance
  - Wilful insubordination
  - Attempt to gain unauthorised access to confidential/proprietary information
  - Quoting incorrect information, which may result in undue benefit(s) to the employee or unfavourable decision(s) for another employee.

12. Customer Privacy and Information Security

In each of our businesses, we are entrusted with important information about our customers – information vital to our ability to provide quality products and services. The JSGCL owes a strict duty of confidentiality to their customers. You will not disclose to any third party particulars of the identity or financial, business or personal affairs of a customer, except pursuant to a statute or regulation, or a valid court order or unless:

- The customer has given prior written consent
- Disclosure is compelled by a court or statutory authority of competent jurisdiction
- Disclosure is compelled by law, due to money laundering, or by regulatory requirements, or
- Disclosure is necessary to protect the JSGCL's interest, for example disclosure to the police in case of suspected fraud.

These actions may result in initiation of disciplinary inquiry and consequent award of a penalty.

13. Depending upon the severity of action(s) and its related consequences, the adjudicator may award penalty, appropriate to the event.

14. The adjudicator, pending (or during) inquiry, may also suspend the erring employee. During suspension, the employee will be allowed 50% of basic pay only as subsistence allowance. However, if the employee is cleared from all charges, then he/she will be deemed to have been working for the period of suspension and full salary and other allowances will be paid. Maximum period of one time suspension will be 5 days and may be rolled over on the discretion of the Chief Executive Officer.

15. The following classifies different types of penalties as Minor and Major:

- | Major                                | Minor  |
|--------------------------------------|--|
| <input type="checkbox"/> Demotion    | <input type="checkbox"/> Oral or written reprimand       |
| <input type="checkbox"/> Termination | <input type="checkbox"/> Withholding of increment        |
|                                      | <input type="checkbox"/> Recovery of loss                |
|                                      | <input type="checkbox"/> Suspension for specified period |