

CAL Info Training & Consultancy Pvt Ltd.

R.O.: 2617/A, Jyoti Nagar, Kurukshetra-136118 India

B.O.: SCO 59, 2nd floor, Sector 17, Kurukshetra - 136118

CODE OF CONDUCT

It is vital to the financial success of CAL Info Training & Consultancy Private Limited that we conduct our business with honesty and integrity and in Compliance with all applicable legal and regulatory requirements. This code of Conduct sets out the fundamental standards to be followed by employees in their everyday actions on behalf of the Company. Further guidance on the Company's standards in specific areas will be provided through related corporate policies and guidelines.

The policy applies to all CAL Info Training & Consultancy Private Limited employees including trainees and temporary staff. In this Code "Company or We" refers to the CAL Info Training & Consultancy Pvt. Ltd. and "Employee or You" refers to each individual who is working in Company on contract or full time employment.

Policy:

1. Conduct the Company's business with honesty and integrity and in a professional manner that protects the company's good public image and reputation. And do not reveal any company sensitive information or business model to anyone.
2. Build relationships with customers, vendors and fellow employees based on trust and treat every individual with respect and dignity in the conduct of Company business.
3. Become familiar and comply with legal requirements, Company policy and procedures.
4. Avoid any activities that could involve or lead to involvement in any unlawful practice or any harm to the Company's reputation or image.

5. Avoid actual or potential conflicts or interests with the Company, or the appearances thereof, in all transactions.
6. Provide accurate and reliable information in records submitted, safeguard the Company's confidential information, and respect the confidential information or other parties with whom the Company does business or competes.
7. Promptly report to the Company any violations of law or ethical principles or Company policies that come to the employee's attention and cooperate fully in any audit, inquiry, review or investigation by the Company.
8. Every employee has a duty of undivided loyalty to the CAL Info Training & Consultancy Private Limited. This means that employees should make decisions objectively and in the Company's best interests. Competing personal interests can interfere with an employee's judgment or create an unfavorable impression or implication of impropriety.
9. For every employee, there is a mandatory shift of minimum 9 hours and it can be flexible with the sole discretion of the competent authority. The company can ask for stretching the 9 hours' job as and when required.
10. The salary, stipend or any other indirect or direct pay-out will directly transfer to your bank account or through cheques only.
11. The company will deduct your 25% part of salary each month up to first 3 months as security and it will be released to you in a final settlement or before leaving. The same part or security will not be provided for any intentional loss done by you or relieve company without notice period (refer point 14).
12. The employee is allowed to take the total of 12 Casual or Sick Leaves (one each month).
 - 12.1. If an employee takes leave on the prefix and suffix of a holiday or weekly off. The complete period would be considered as leave. Like if you take leave say from Friday to Monday (both days inclusive), then Sunday or whatever public holiday comes in between is considered as casual leave.

- 12.2. Leaves on short notice will not be entertained except some exceptions. So all employees are requested if you want leave please **apply at least 2 days before** leave date.
- 12.3. An employee cannot apply leave for more than 3 consecutive days on portal. If you need leave 3 or more than 3 days, compose an email to your concerned head of the department and get approval to apply the leave on portal. In case if you are not registered on the portal than email your team lead.
- 12.4. More than 12 casual leaves will be self-pay leave and the compensation will be adjusted according to the leaves taken. (**Without any intimation or notification leave will also be considered as self-paid leave**)
- 12.5. 4 short leave will be considered as 1 full day leave. Short leave duration start after 20 minutes to 2 hours max. Beyond that it will be marked as half day.
- 12.6. If any employee apply half day leave, working hour will be as follows:
- 12.6.1. On leave half day afternoon - working hour from 9.00. am to 2.00 pm
- 12.6.2. On leave half day morning - working hour from 2:00 pm to 7.00 pm
- 12.7. Employees are permitted to take two flex break of 5-10 minutes. More than 2 flex break will be considered as extra break.
13. The employee must protect the Company's assets, resources, and information and may not use these for personal use unless approved by the competent authority.
- 13.1. You can't use the company's communication media on your personal mobile or PC without any permission of your department's team lead or manager.
- 13.2. You can't carry the company's assets with you without any intimation to your team lead or manager.
14. It is mandatory to give a minimum notice period of one month before leaving the company. And before leaving, also you will have to return company property (including email id or any other communication tool), which may in your possession. It would be obligatory on your part to get a proper relieving letter from the management or competent authority before your services are deemed to be concluded.
- 15. Handling Confidential Information –**
- 15.1. Employees should use information received in the course of their business dealings only for the purpose it is intended or normally used and never for personal

gain or for a third party's gain. They should also not release confidential data or information to others without proper authorisation.

15.2. The Company has many kinds of business relationships with many companies and individuals. All employees should take special care to handle confidential information of our customers, potential customers, suppliers, potential suppliers or any other third party with responsibility.

15.3. Insider trading is prohibited by both Law as well as by the company policy. Insider trading generally involves the act of subscribing or buying or selling of the Company's Securities, when in the possession of any Unpublished Price Sensitive Information about the Company.

15.4. In keeping with the terms of the Employment Contract, all employees shall, during their service with the Company, devote their full time attention to the responsibilities entrusted to them. No employee will serve as an employee, agent, director, partner or consultant of any other business enterprise.

16. No outside employment activity shall take place during normal work hours.

16.1. No employee shall solicit or promote any personal/public cause or organisation/ association during working hours.

16.2. No employee shall use alcohol, smoking or illegal or illicit substances or any weapon at the worksite.

17. Employees must report promptly at the starting time of a shift and are not supposed to leave before the scheduled end time of the shift without the specific approval from the competent authority.

18. Threatening, intimidating, interfering with, or using abusive language attempting, or doing bodily harm to another person is not allowed in any case and if any case is found this will lead to removal from the employment of company on the immediate basis.

19. We are an equal opportunity employer and believe every employee is entitled to fair treatment, courtesy, and respect. We do not tolerate illegal employment discrimination or unlawful workplace harassment.

20. Gadgets & Application Usage: During shift work hours, Employees are not supposed to keep their phones with them until necessary.

20.1. Avoid the use of social media application either on mobile or PC in working hours may be considered as discipline violation (depends on the situation). And the disciplinary action can be taken against you as short leave.

20.2. You are permitted to access your personal accounts at work if you are in the digital marketing team of company. But, we expect you to act responsibly, according to our policies and ensure that you stay productive. Specifically, we ask you to:

20.3. **Discipline yourself:** Avoid getting side-tracked by your social platforms.

20.4. Ensure others know that your personal account or statements don't represent our company. For example, use a disclaimer such as "opinions are my own."

20.5. Avoid sharing intellectual property (e.g. trademarks) or confidential information. Ask your manager or PR first before you share company news that's not officially announced.

20.6. Avoid any defamatory, offensive or derogatory content. You may violate our company's anti-harassment policy if you direct such content towards colleagues, clients or partners.

21. Representing our company through social media: If you handle our social media accounts or speak on our company's behalf, we expect you to protect our company's image and reputation. Specifically, you should:

21.1. Be respectful, polite and patient.

21.2. Avoid speaking on matters outside your field of expertise when possible.

21.3. Follow our confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism and fair use.

21.4. Coordinate with our [PR/Marketing department] when you're about to share any major-impact content.

21.5. Avoid deleting or ignoring comments for no reason.

21.6. Correct or remove any misleading or false content as quickly as possible.

22. Internet usage: Our corporate internet connection is primarily for business. But, you can occasionally use our connection for personal purposes as long as they 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:

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

23. Payments, gifts & entertainment –

- 23.1. The Company will not make any contribution of company funds, property or services to a political party or religious organization, or to a candidate for or holder of any Government office.
- 23.2. No employee will offer any gifts, favours or entertainment to others that are:
 - not consistent with customary business practice.
 - Excessive in value and / or could be construed as a bribe or pay-off in violation of applicable laws or ethical standards, such that public disclosure could embarrass the Company or oneself.
- 23.3. Employees should get the prior approval of the Business/Functional Head to incur any expenses towards entertainment. Business /Functional Heads are responsible to monitor the incurred entertainment expense patterns of their employees to ensure that the amount is used judiciously. All expenditure which does not have the necessary documentation, bills, etc. will not be reimbursed. Entertainment expenditure on alcoholic drinks will be permitted only with the specific approval of the Business / Functional Head.
- 23.4. Employees will be reimbursed outstation travel/local conveyance expenses incurred on account of official work as per policy of his/her Company. Employees should claim only expenses actually incurred and should not inflate/falsify expense claims even if these are within the prescribed limits for the individual. Under no circumstances shall personal expenses be reimbursed by the company.

24. The Company reserves the right to access and monitor all messages and files on its system, including information regarding employee internet use, as and when deemed necessary and appropriate. The electronic resources shall be used in an effective, ethical and lawful manner. Users who receive or notice obscene or inappropriate messages are needed to report the same immediately to their immediate superior or the Human Resources Department. The Company will not be responsible for actions of employees deemed illegal with respect to the usage of electronic resources

25. **Media Policy:** Employees should refrain from interaction/communication with the print and electronic media on matters which are likely to have an impact on the image of the Company as a whole without consulting the Delegation office.

It is important to ensure that all statements made to the media are true and fair. Each business unit and division shall have selected persons who are authorized to speak to the media on identified subjects.

Employees should not disclose non-public information selectively to a particular company. One should ensure approval of customers, vendors etc. if reference is made about such customers. Posting or discussing information concerning the Company's services or business on the Internet without the prior written consent of the Head of the Company / Business is prohibited.

26. **Workplace visitors:** If you want to invite a visitor to our offices, please ask for permission from our [HR Manager/ Security Officer/ Office Manager] first. Also, inform our [reception/ gate/ front-office] of your visitor's arrival. Visitors should sign in and show identification. When you have office visitors, you also have responsibilities. You should:

26.1. Always tend to your visitors (especially when they are underage.)

26.2. Keep your visitors away from areas where there are confidential records, No Entry area or sensitive equipment.

26.3. Prevent your visitors from proselytizing your colleagues, gathering donations or requesting participation in activities while on our premises.

26.4. Anyone who delivers orders, mail or packages for employees should remain at our building's reception or gate. If you are expecting a delivery, [front office employees / security guards] will notify you so you may collect it.

27. Employee relationships: We want to ensure that relationships between employees are appropriate and harmonious. We outline our guidelines and we ask you to always behave professionally.

27.1. **Fraternization:** Fraternization refers to dating or being friends with your colleagues. In this policy, “dating” equals consensual romantic relationships and sexual relations. Non-consensual relationships constitute sexual violence and we prohibit them explicitly.

27.2. **Dating colleagues:** If you start dating a colleague, we expect you to maintain professionalism and keep personal discussions outside of our workplace.

You are also obliged to respect your colleagues who date each other. We won't tolerate sexual jokes, malicious gossip and improper comments. If you witness this kind of behaviour, please report it to HR.

27.3. **Dating managers:** To avoid accusations of favoritism, abuse of authority and sexual harassment, supervisors must not date their direct reports. This restriction extends to every manager above an employee.

Also, if you act as a hiring manager, you aren't allowed to hire your partner to your team. You can refer them for employment to other teams or departments where you don't have any managerial or hiring authority.

27.4. **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. Employment of relatives.

27.5. **Employment of relatives:** Everyone in our company should be hired, recognized or promoted because of their skills, character and work ethic. We would not like to see phenomena of nepotism, favoritism or conflicts of interest,

The above guidelines and code of conduct are to be followed by each employee of CAL Info Training & Consultancy Private limited irrespective of his / her level and department. These guidelines, policies, and code of conduct are designed to make sure that CAL Info Training & Consultancy Private limited and its employees carry out their responsibilities, ethically and honestly. All employees must follow these throughout their tenure at CAL Info Training & Consultancy Private limited.

CAL Info Training & Consultancy Private limited lays great emphasis on this code of conduct guidelines and believes that these are critical in ensuring a constructive and positive work environment at CAL Info Training & Consultancy Private limited along with portraying a good image of CAL Info Training & Consultancy Private limited to outside world. Hence, CAL Info Training & Consultancy Private limited will not tolerate any violations and appropriate disciplinary action will be taken against any employee found to be violating these. CAL Info Training & Consultancy Private limited management will decide on the nature of such disciplinary action on a case to case basis depending on the severity of the violation.

To report violations of the Policy without fear of restriction, or to request advice when in doubt about the propriety of some action, kindly write to info@calinfo.in or inform the higher authority.

Note:

CAL Info Training & Consultancy Private Limited reserves the right to amend or change the code of conduct or any service at any time without notice. We encourage you to periodically review or ask for these guidelines to ensure you are in compliance.

Sincerely

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