

**IPE GLOBAL LIMITED, NEW DELHI**

**CODE OF CONDUCT POLICY**

**1. OBJECTIVE**

To provide guidance to all employees of IPE Global ("the company) on how and in which manner should they conduct themselves while at work.

**2. SCOPE**

The Code of Conduct is applicable to all employees of IPE Global.

**3. TERMS AND CONDITIONS**

At IPE Global, employees are expected to maintain the highest standard of conduct at all times. Their personal appearance, their actions and the impressions they make both during and after office hours are important to their growth and to the enhancement of the reputation of the employee and the company. It is therefore expected that they would conduct themselves as per the high standards of social and corporate citizenship. Any lapse in this regard may call for disciplinary action as per the existing norms of the company.

The circumstances of conducts as set out below, although not exhaustive, are intended to cover situations that may occur. In case an employee encounters any circumstance, which is not covered hereunder or in case of any doubt, he should seek guidance from the Human Resource department and act accordingly.

**i. Personal Conduct**

Working in a team would require some alignment of individual habits to create a mutually conducive work environment. It is every employee's responsibility to refrain from the following:

- Use of abusive language with friends/ colleagues
- Loud talking/ disturbing work in the office
- Sending unsolicited mails.

Every employee is expected to treat clients and colleagues with respect and courtesy.

**ii. Conflict of Interest**

As a part of the IPE Global, employees are expected not to engage themselves, directly or indirectly, either honorary or on remuneration, in any service, trade, business, vocation or occupation (including agent of any organisation) or in any advisory capacity. All employees must abide by the **IPE Global Conflict of Interest (Col) Policy** (documented separately).

**iii. Confidentiality**

The Company owns certain exclusive proprietary information which is valuable. Misuse or unauthorised disclosure of any confidential information would constitute an act injurious to Company and that the unauthorised disclosure or use of any confidential information may adversely affect the Company's business, competitive position and goodwill.

By signing the Offer & Appointment letter at the time of joining the company, employees are bound by a confidentiality and non-solicitation agreement to refrain from disclosing any information that is of confidential nature. This shall apply while the employee is in employment of the company and also, post separation until such information becomes part of public domain.

#### iv. Talking to Media

Employees are refrained from talking to media unless authorised by the management. For more details, refer **IPE Global Media Policy and Protocol**.

#### v. Compliance with Rules & Regulations

The employees are expected to follow the following rules and regulations. In case an employee is found to be not observing the same the company would apply the disciplinary policy.

Employees are expected to adhere to all rules/policies/instructions / notices applicable.

Employees are discouraged from making false complaints, statements and representation to anybody that is likely to bring the company into disrepute, disrespect or defamation in the eyes of the public or in the eyes of law.

Employees are expected to be absent only when their leave has been sanctioned and are not allowed to overstay beyond sanctioned leave.

Employees are expected to receive/ accept official communication.

Employees are not expected to distribute or exhibiting of newspapers, handbills, pamphlets or posters of any kind inside the company premises without the written sanction of the management.

Employees should not raise false grievance.

#### vi. Gifts

The organization as a matter of policy discourages its employees to take the clients out for diner/ drinks and give them gifts.

IPE Global does not support the action of employees securing material benefits from any institution/individual for the purpose of securing projects or for any other benefits. If any employee is found resorting to such means then legal action would be taken by the organization.

The organization strongly prohibits its employees from offering bribes to any authorities/institutions and hence would not support such acts of misconduct.

Likewise, any gifts received by any person from a client, vendor, or any other party must be brought to the notice of the management and handed over to the organization. The only exceptions are diary, calendar and planners.

However, the organization encourages its employees to send greeting cards/email to its external client during Diwali/ New Year. For this, each year, the organization prepares greeting cards with company logo. Each employee would send their request to the Corporate Communication Department at least 45 days before Diwali or New Year, so that the cards/e-cards can be sent to them. Standard formats for email greetings should be used.

#### vii. Fraud

Employees should produce genuine and authentic bills to seek reimbursements for travel, food, medical, petrol, etc. **If found guilty strict action will be taken, including termination from the services of the organization.**

Employees should provide accurate personal information regarding the name, age, father's name, qualifications, previous service any other personal data sought at the time of confirming the employment to IPE Global or thereafter.

All employees must abide by the **IPE Global Anti-Fraud and Anti-Corruption Policy** (documented separately).

#### **viii. Bullying**

The company as a policy condemns any act of bullying at workplace. Workplace bullying would include any act which falls under the following points:

- a) Repeated threatening, humiliating, or intentionally intimidating an individual at workplace by acts such as violence, blackmailing, etc.
- b) Any kind of verbal abuse including shouting or raising your voice in public or in private
- c) Publicly humiliating an employee in any manner including spreading rumors or defaming someone
- d) Any action that prevents any employee from completing/getting their work done
- e) Any kind of personal insult, mocking, using obscene gestures or addressing an employee with offensive nicknames
- f) To not allow an employee to speak or express himself (For example interrupting or ignoring an individual)

IPE Global condemns all the actions mentioned above and is strictly against any act of bullying at workplace. Any employee who performs an act of bullying at workplace would be breaching the anti-bullying policy of the organization and would be subject to disciplinary action if proved guilty.

All employees must abide by the **IPE Global Anti-Bullying Policy** (documented separately).

#### **ix. Child Protection**

IPE Global is committed to the dignity and equality of all people in all the programmes and projects we undertake - and especially to the principle that our projects should 'do no harm'. The company has a zero-tolerance approach towards child exploitation or abuse. The company respects the rights of children and is committed to upholding & safeguarding their rights to protection against violence, exploitation, and abuse. The company expects its workforce including others who work with the company to have children's best interests at the heart of their involvement with the company and conduct themselves ethically & with integrity, whether during normal course of conducting business or out of working hours.

The commitment to Child Protection is informed by set of principles which include:

- a. Zero tolerance of child exploitation or abuse.
- b. All children have equal rights to protection from abuse and exploitation.
- c. Each child has a fundamental right to life, survival and development.
- d. All children should be encouraged to fulfil their potential, and inequality and discrimination should be challenged.
- e. Children will be assured the right to express their views freely and this will be given 'due weight' in accordance with their age and level of maturity. We will not discriminate against the child. The child will be treated with respect irrespective of gender, nationality or ethnic origin, religious or political beliefs, age, physical or mental health, sexual preference and gender identity, family, socio-economic and cultural background, or any history of conflict with the law.
- f. Everybody has a responsibility to support the care and protection of children.

- g. No child must come to harm as a result of their engagement with IPE Global as a sponsored child, a participant in programme/ project or as part of any advocacy campaign of the Company.

All employees must abide by the **IPE Global Child Protection Policy** (documented separately).