



## PathPartner Code of Conduct Policy

**PathPartner Technology Pvt. Ltd.**

Policy Document - PL/20/038

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**PathPartner Code of Conduct Policy****Revision History**

<b>Version #</b>	<b>Description of changes</b>	<b>Author(s)</b>	<b>Approval</b>	<b>Date of Release</b>
1.00	Initial baseline	Rashmi Ravikumar	Girish C Sabat	22-Jun-2020
1.10	Policy re-named to Personnel Code of Conduct.	Rashmi Ravikumar	Girish C Sabat	06-Aug-2020
1.20	Updation of Code of Conduct Policy and name is updated as <b>PathPartner Code of Conduct Policy</b>	Girish C Sabat	Board of Directors	10-Mar-2022
1.21	Updated the email ID in sec 4 from <a href="mailto:ombudman@kpit.com">ombudman@kpit.com</a> to <a href="mailto:ombudsman@kpit.com">ombudsman@kpit.com</a>	Bhavya Janardhan	Girish C Sabat	07-Jun-2022

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## PathPartner Code of Conduct Policy

### 1. Policy brief & purpose

PathPartner **Code of Conduct policy** outlines Company's expectations regarding employees' behavior towards their colleagues, managers, customers and overall organization. The purpose of these rules are not to restrict the rights of anyone, but rather to help people work together harmoniously according to the standards established for efficient and courteous services for PathPartner's customers.

PathPartner promotes freedom of expression and open communication but expects its employees to foster a well-organized, respectful and collaborative environment. They should avoid offending, participating in serious disputes and disrupting our workplace.

### 2. Scope

This policy applies to all directors, permanent employees, consultants, contractors, trainees, interns and probationers of PathPartner.

Directors and employees, consultants, contractors, trainees, interns and probationers must read and become familiar with these policies and the Code of Conduct and are expected to comply fully – in letter and spirit – with the same in conduct of all their efforts on behalf of the Company.

### 3. Policy elements

PathPartner employees are bound to follow Employee Code of Conduct while performing their duties at PathPartner premises or On-site at Customer premises or working from home or at other off-site location. This Code is subject to continuous review with a purpose of keeping it updated, healthy and aligned with the Company's objectives. Any amendment/inclusion or waiver of any provision of this code shall be approved by the Company's Board of Directors or a Committee of Directors, constituted for the purpose and in applicable regulatory filings pursuant to the applicable laws and regulations together with the details about the nature of the amendment or waiver.

#### 3.1. Components of PathPartner Code of Conduct Policy are outlined below:

##### 3.1.1. Compliance with law

All employees must protect Company's legality. They should comply with all environmental, safety and fair dealing laws. PathPartner expects employees to be ethical and responsible when dealing with Company's finances, products, partnerships and public image.

##### 3.1.2. Protection of Company Property

All employees should treat Company's property, whether material or intangible, with respect and care.

#### Employees:

- Shouldn't misuse **Company equipment** or use it frivolously.
- Should respect all kinds of **incorporeal property**. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.

Employees should protect Company facilities and other material property from damage and vandalism, whenever possible.

##### 3.1.3. Professionalism

All employees must show integrity and professionalism in the workplace.

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- **Personal appearance**

All employees must be clean and well-groomed. Grooming styles dictated by religion and ethnicity aren't restricted. All clothes must be work-appropriate and must project professionalism. Employees must avoid sweat pants, sweat shirts, and flip flops.

- **Corruption**

PathPartner discourages employees from accepting gifts from vendors, clients or customers.

- **Job duties and authority**

All employees should fulfill their job duties with integrity and respect their customers and the stakeholders. Managers mustn't abuse their authority. PathPartner expects them to delegate duties to their team members taking into account their competences and workload. Likewise, PathPartner expects team members to follow managers' instructions and complete their duties with skill and in a timely manner. Ignoring work duties or loafing during working hours and habitual negligence or neglect of work is unacceptable.

PathPartner encourages mentoring throughout the organization.

- **Absenteeism and tardiness**

Employees shall observe the working hours, working rules and policies of PathPartner or Customer while working on PathPartner premises or Customer premises or working from home or at other off-site location, as the case may be. PathPartner can make exceptions for occasions that prevent employees from following standard working hours or days. But, being habitually tardy or taking unexcused absences from work will be subject to disciplinary actions.

- **Conflict of interest**

PathPartner expects employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

- **Communication of Separation**

All employees must inform their decision of separation to their reporting or project manager at PathPartner and HR. Employees should not discuss their resignation or notice period with the Customers.

- **Benefits**

PathPartner expects employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits Company offers.

- **Policies**

All employees should read and follow PathPartner policies. If they have any questions, they should ask their manager/s or Human Resources (HR) department.

#### 4. Violation of the Code

Any violation of law, rule or regulation, or deviation from the standards provided by in this Code or any policies by any of the directors/employees will result in disciplinary action, which may include, one/more of the following actions, but not be limited to

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- Oral or written warning
- Disciplinary probation or suspension
- Reduction in salary and/or demotion along with a fine/penalty or
- Dismissal from employment

Members of the Disciplinary Action Committee will include Mr. Tushar Adhikary, Managing Director, Mr. Girish Sabat, Whole-time Director & HR Head. Mr. Anil Patwardhan, will act as Ombudsman of the Committee.

Employees witnessing the violation of code are encouraged to first raise the concern by writing an email to the Ombudsman at [ombudsman@kpit.com](mailto:ombudsman@kpit.com). Depending on the scope and type of concern, the issue shall be referred to the Disciplinary Action Committee by ombudsman. The appropriate disciplinary action to be imposed will be determined by the Disciplinary Action Committee under supervision of Board of Directors. The Company does not guarantee that one form of action will necessarily precede another.

Further, a supervisor who directs or approves a director's or employee's improper actions, or who is aware of those actions but does not take appropriate steps to correct them, or who otherwise fails to exercise appropriate supervision will be subject to similar disciplinary action. Directors and employees are also reminded that actions in violation of this Code may also be unlawful and thus may subject an offending Director/ employee to Civil or Criminal liability.

Upon any determination by the Disciplinary Committee that there is a violation of the Code, the Employee shall have the right to appear before such Disciplinary Committee to refute any determination of the violation and any termination of the Employee's employment or any action against the Employee by reason of such determination shall not be effective until the Employee is afforded an opportunity of fair and impartial hearing on the principles of natural justice.

### 5. Protecting Confidential Information

Protecting Company's information is the responsibility of every director/ employee and all directors and employees share a common interest in making sure it is not improperly or accidentally disclosed.

One must not discuss Company's confidential business information with outsiders. Confidential information is anything that is not in the public domain. If a director/ employee has any questions regarding what information is Confidential Company Information, the director/ employee should discuss the issue with his or her immediate supervisor.

This policy represents management guidelines only and should not be interpreted as a contract of employment. Every director/ employee will sign a separate Confidentiality Agreement.

### 6. Non-Harassment & Prevention of Sexual Harassment

Pathpartner Technology Private Limited prohibits harassment, of any director/ employee by another director/ employee, supervisor or third party for any reason including, but not limited to, age, race, color, mental or physical disability, national origin, veteran status, marital status, religion and/or sex.

Harassment of third parties by our directors and employees is also prohibited. Company also strictly prohibits sexual harassment of any director/ employee by another director/employee, supervisor or third party.

The Company has put in place independent policies on Non – harassment and prevention of sexual harassment.

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**Undertaking**

(This Undertaking is a part of PathPartner’s Internal Code of Conduct applicable to all permanent employees, consultants, contractors, trainees, interns and probationers of PathPartner).

I, \_\_\_\_\_, S/o \_\_\_\_\_, aged about \_\_\_\_\_,  
R/o \_\_\_\_\_, do hereby solemnly affirm and sincerely state on oath  
as follows:

That I have been recruited to PathPartner Technology Pvt. Ltd. (Hereinafter referred to as the  
“Company”/“PathPartner”) as \_\_\_\_\_ at \_\_\_\_\_ (Location) with effect from \_\_\_\_\_.

That during my employment with the Company, I agree and undertake that I shall be governed  
by the rules, regulations, employee benefits, policies & procedures of the Company stored in  
the Company’s Document Repository (PPWorld). I undertake to familiarize myself with the Company  
Policies and all amendments incorporated in the same from time to time by logging on to  
PPWorld through Company’s Intranet (PPOne) through my unique identification code provided to me  
on my joining the Company.

In addition, I will adherence to the PathPartner Code of Conduct policy.

I confirm that the above information provided is true to the best of my knowledge and I have  
read the contents fully and understood the same and herewith undertake to abide in all its entirety.

Date:

Place:

\_\_\_\_\_  
(Signature)