

BITMUTEX TECHNOLOGIES PRIVATE LIMITED

CODE OF CONDUCT

Version - 1

Document Release History

Sl. No.	Version Number	Release Date	Prepared By	Reviewed & Approved By	Reasons for New Release
1	1	30.03.2023	Adarsh Sureka	Amit Kumar Nandi	Need of a model Code of Conduct

Introduction:

At Bitmutex Technologies, we are committed to maintaining the highest standards of ethics and professionalism in all our dealings. Our success is built on the trust of our employees, vendors, and clients, and we recognize the importance of upholding that trust. This Code of Conduct Policy sets out our expectations for all those who work with or for us.

Purpose:

The purpose of a code of conduct is to establish a set of standards and expectations for behaviour that all individuals associated with a company or organization should adhere to. The code of conduct serves as a guide for employees, vendors, and customers to ensure that they understand the expectations for ethical and responsible behaviour within the company.

Scope:

The scope of the code of conduct can vary depending on the company or organization, but generally, it applies to all individuals associated with the company, including employees, vendors, contractors, and customers. The code of conduct can cover a wide range of topics, including compliance with laws and regulations, protection of company assets, respect for human rights, fair business practices, and professional conduct.

The code of conduct serves several important purposes, including:

1. **Setting Expectations:** The code of conduct outlines the behaviour that is expected of all individuals associated with the company. This helps to ensure that everyone is aware of the standards and expectations for ethical and responsible behaviour.
2. **Promoting Ethical Behaviour:** By setting clear standards for behaviour, the code of conduct promotes ethical behaviour and helps to prevent misconduct.
3. **Protecting the Company:** The code of conduct helps to protect the company from legal and reputational risks by ensuring that all individuals associated with the company understand their obligations and responsibilities.
4. **Building Trust:** By promoting ethical behaviour and transparency, the code of conduct helps to build trust with customers, vendors, and other stakeholders.

Violations of the Code Any violation of law or deviation from the what is provided by in this Code or any policies by any of the director/ employee/vendor/client will result in disciplinary action, which may include,

- An initial Oral/ written warning from the reporting head
- Disciplinary probation or suspension from the HR Department
- Reduction in salary and / or demotion along with a fine/penalty or
- Dismissal from employment
- Civil or criminal liability.

Our Core Values

Customer Focus: At our organization, we prioritize customer satisfaction and strive to exceed their expectations. We actively listen to their needs, provide personalized solutions, and maintain open lines of communication. Our employees are trained to put the customer first and deliver exceptional service, ensuring a positive experience at every touchpoint.

Integrity: We uphold the highest standards of integrity in all our interactions. We act with honesty, transparency, and fairness in our dealings with customers, colleagues, and stakeholders. We maintain confidentiality and handle sensitive information with utmost care. Our employees are expected to follow ethical business practices, adhering to legal requirements and avoiding conflicts of interest.

Skill Development: We believe in fostering a culture of continuous learning and skill development. We provide opportunities for our employees to enhance their expertise, acquire new skills, and stay updated with industry trends. Through training programs, mentorship, and career development initiatives, we empower our workforce to grow both personally and professionally.

Innovation: We encourage and value innovation at all levels of our organization. We promote a creative and forward-thinking environment that embraces new ideas, technologies, and processes. Our employees are encouraged to think outside the box, challenge the status quo, and contribute to the development of innovative solutions that benefit our customers and drive business growth.

Teamwork: Collaboration and teamwork are key drivers of our success. We foster a supportive and inclusive work environment where employees work together harmoniously, respecting and leveraging each other's strengths. We value diverse perspectives, encourage effective communication, and promote a spirit of cooperation and mutual respect. Our employees are encouraged to collaborate across departments and contribute to the collective goals of the organization.

By adhering to these principles, we create a work culture that not only ensures exceptional customer service but also promotes personal growth, ethical conduct, innovation, and strong teamwork. All employees are expected to embrace and uphold this Code of Conduct policy, demonstrating commitment to our values and fostering a positive and productive work environment.

Employee Code of Conduct:

As employees of Bitmutex Technologies, we are expected to conduct ourselves with the utmost integrity and professionalism at all times. This includes:

1. **Compliance with Laws and Regulations:** As an IT service company, we operate in a highly regulated environment. We expect all employees to comply with all applicable laws and regulations, including data protection laws, intellectual property laws, and anti-bribery laws. This means that we expect employees to obtain necessary licenses, permits, and certifications, and to ensure that their actions are legal and ethical.
2. **Honesty and Transparency:** We expect employees to be truthful in their communications and actions, and to disclose any conflicts of interest. This means that we expect employees to report any potential conflicts of interest to their managers, and to avoid situations that could create a conflict of interest. We also expect employees to report any violations of the law or unethical behaviour that they become aware of.
3. **Respect and Dignity:** We expect all employees to treat each other with respect and dignity, and to create a work environment that is free from discrimination and harassment. This means that we expect employees to refrain from engaging in any form of discrimination or harassment, and to report any incidents of such behaviour to their managers or HR.
4. **Protection of Company Resources:** We expect all employees to protect the company's resources, including intellectual property, confidential information, and physical assets. This means that we expect employees to use company's resources only for legitimate business purposes, to protect confidential information from unauthorized disclosure, and to take reasonable steps to prevent loss or damage to company resources.
5. **Professionalism:** We expect all employees to act professionally in their interactions with customers, vendors, and partners. This means that we expect employees to maintain confidentiality, avoid conflicts of interest, deliver high-quality service, and comply with all applicable laws and regulations.
6. **Prevention of Sexual Harassment:** Our Company prohibits any kind of harassment including but not limited to age, race, colour, mental or physical disability, national origin, veteran status, marital status, religion and/or sex. The Company also has a separate policy for Sexual Harassment in this regard.
7. **Abolition of Child Labour:** Our Company is against child exploitation and do not support child labour in any form of work/activities and hiring of Individuals who are under the age of 18 is strictly prohibited in the Company.
8. **Use of Alcohol/Drugs/any Medication:** Our workplace Code of Conduct policy prioritizes the safety, well-being, and productivity of all employees. To ensure a healthy and conducive working environment, the policy strictly prohibits the unauthorized use, possession, or distribution of drugs, medication, and alcohol on company premises or during work-related activities. Employees are expected to refrain from engaging in any form of substance abuse that may impair their judgment, performance, or pose a risk to themselves and others. Additionally, the policy emphasizes the importance of seeking appropriate medical advice and obtaining necessary approvals for any prescribed medications that may affect an

employee's ability to carry out their duties effectively. By adhering to these guidelines, we promote a culture of professionalism, accountability, and respect in our workplace.

9. **Conflict of Interest:** Our Code of Conduct policy aims to uphold the highest standards of integrity and ethical behavior within our organization. We recognize the potential for conflicts of interest to compromise fairness, objectivity, and the trust our stakeholders place in us. As such, this policy requires all employees to disclose any personal, financial, or professional interests that may conflict or appear to conflict with their duties and responsibilities. It is essential for employees to act in the best interest of the company and avoid situations where personal gain or outside influences could influence their decision-making. By fostering transparency and accountability, we ensure that our actions and decisions are based solely on merit, and our stakeholders can have full confidence in our commitment to ethical conduct and the success of our organization.

Vendor and Partner Code of Conduct:

We expect our vendors and partners to uphold the same standards of integrity and professionalism that we expect from our employees. This includes:

1. **Compliance with Laws and Regulations:** We expect all vendors and partners to comply with all applicable laws and regulations, and to conduct their business in an ethical and responsible manner. This means that we expect vendors and partners to obtain necessary licenses, permits, and certifications, and to ensure that their actions are legal and ethical.
2. **Respect for Human Rights:** We expect all vendors and partners to respect the human rights of their employees and to provide a safe and healthy work environment. This means that we expect vendors and partners to provide fair wages, reasonable working hours, and safe working conditions, and to prohibit any form of forced labour or child labour.
3. **Fair Business Practices:** We expect all vendors and partners to engage in fair business practices, including fair pricing and transparent billing. This means that we expect vendors and partners to provide accurate and complete information about their products and services, and to avoid any practices that could be considered deceptive or misleading.
4. **Confidentiality and Intellectual Property:** We expect all vendors and partners to protect our confidential information and intellectual property, and to use them only for legitimate business purposes. This means that we expect vendors and partners to sign non-disclosure agreements and to take reasonable steps to prevent unauthorized access to our confidential information and intellectual property.
5. **Conflict of Interest:** Our Code of Conduct policy aims to uphold the highest standards of integrity and ethical behavior. We recognize the potential for conflicts of interest to compromise fairness, objectivity, and the trust our stakeholders place in us. As such, this policy requires all vendors/partners to disclose any personal, financial, or professional interests that may conflict or appear to conflict with their duties and responsibilities. By fostering transparency and accountability, we ensure that our actions and decisions are based solely on merit, and our stakeholders can have full confidence in our commitment to ethical conduct and the success of our organization.

Customer/Client Code of Conduct:

We value the trust that our clients place in us, and we are committed to upholding that trust. This includes:

1. **Quality Service:** We are committed to providing high-quality service to our clients, and to meeting or exceeding their expectations.
2. **Transparency and Honesty:** We believe in being transparent and honest in our dealings with clients, including providing accurate and timely information and disclosing any conflicts of interest.
3. **Confidentiality and Intellectual Property:** We are committed to protecting our clients' confidential information and intellectual property, and to using them only for legitimate business purposes.
4. **Compliance with Laws and Regulations:** We are committed to complying with all applicable laws and regulations, and to conducting our business in an ethical and responsible manner.
5. **Conflict of Interest:** Our Code of Conduct policy aims to uphold the highest standards of integrity and ethical behavior. We recognize the potential for conflicts of interest to compromise fairness, objectivity, and the trust our stakeholders place in us. As such, this policy requires all customers/client to disclose any personal, financial, or professional interests that may conflict or appear to conflict with their duties and responsibilities. By fostering transparency and accountability, we ensure that our actions and decisions are based solely on merit, and our stakeholders can have full confidence in our commitment to ethical conduct and the success of our organization.

Conclusion:

At Bitmutex Technologies, we believe that upholding high standards of ethics and professionalism is not only the right thing to do, but also essential to our long-term success. We expect all employees, vendors, partners, customers and clients to adhere to this Code of Conduct Policy, and we will take appropriate action if these standards are not met.