



# Code of Conduct and Work Ethics Policy

Document Id	Wissen_POL_CoC&WE (Code of Conduct & Work Ethics)		
Version No	5.2	Date	12 Nov 2024
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## 1. PURPOSE

- This “Code of Conduct and Work Ethics Policy” has been formulated in order to foster and maintain trust and confidence in the professionalism and the integrity of the Employees of the Company by ensuring that all Employees adhere to appropriate standards of conduct as set out in this Policy that maintains and enhances the reputation of the Company.
- This Policy aims to provide guidance to all Employees of the Company on how and in which manner should the conduct of Employees be when they are representing the Company.
- The circumstances of conduct as set out below in this Policy, although not exhaustive, are intended to cover those situations, which are most likely perceived to be encountered by Employees. In case any Employee encounters any circumstance, which is not covered hereunder or in case of any doubt, Employees should seek guidance from the Reporting Manager/ CEO and act accordingly.
- A breach of the Policy may result in disciplinary action against the Employee concerned including, potential dismissal or termination of employment or any other legal action seen as appropriate by the company or all of the above together.
- Wissen is committed to ensure that its business is conducted, in all respects and all the times, according to rigorous ethical, professional, and legal standards. The Company is also committed to creating a workplace, at all of its working locations, that, all the time, is free from harassment and discrimination, where co-workers are respected, and provided an appropriate environment so as to encourage productivity and appropriate conduct.
- To achieve this goal all Employees are expected to:
  - Adhere to this Policy in their professional as well as personal conduct
  - Treat co-workers with respect, courtesy, honesty, and fairness
  - Respect different values, beliefs, cultures, and religions
  - Value the contribution of the people they work with, and work co-operatively
  - Not bully, intimidate, harass, or discriminate against other co-workers

## 2. SCOPE

- This Policy applies to all the Employees of the Company. Employee shall mean all individuals on full-time or part-time employment with the Company, with permanent, probationary, retainer, temporary or contractual appointment.
- The Company also expects its managers to lead by example and perform their duties in accordance with this Policy and ensure that the content of this Policy is communicated to all persons reporting to them.
- If a business location or region has policies, practices, laws or regulations that require more than what is stated in this Policy, then the Employees must follow this policy as a minimum and comply with such

policies, practices, laws, or regulations in that particular region/ country; Business units and locations are responsible for ensuring that their location specific policies and practices are consistent and in compliance with this Policy.

- The Company's reputation and credibility are based upon its total commitment to ethical business practices and on ethical conduct of its Employees. To safeguard the Company's reputation, Employees must conduct themselves in accordance with the highest ethical standards and be perceived to be acting ethically at all times.
- Compliance with all policies of the Company, relevant applicable laws and regulations is the minimum standard which should be adhered to by all the Employees all the times.

### **3. DEFINITIONS**

NA

### **4. RESPONSIBILITIES**

HR Team and CEO are responsible for the oversight and implementation of the policy.

### **5. CLAUSES COVERED UNDER THE POLICY**

#### **5.1. Professionalism**

The personal and professional behavior of Employees shall confirm to the standards expected of persons in their positions, which includes:

- A commitment to and adherence to professional standards in their work and in their interactions with other Employees of the Company.
- A commitment to maintaining the highest standards of integrity and honesty in their work;
- An adherence to ethical and legal standards to be maintained in business;
- A responsibility to support the Company in its efforts to create an open and mutually supportive environment;
- A responsibility to share information and give willing assistance in furthering the goals and objectives of the Company; and
- A responsibility to ensure that there is no misrepresentation of facts. Wherever a misunderstanding is thought to have taken place through unclear communications, this should be corrected promptly.

#### **5.2. Conflict of Interest**

- Each Employee is expected to avoid situations in which his or her financial or other personal interests or dealings are, or may be, in conflict with the interests of the Company. Accordingly, the Company expects its Employees to always act in the Company's interest.
- Employees are advised not to engage in any other business, commercial or investment activity that may conflict with their ability to perform their duties to the Company. Employees must also not engage in any other activity (cultural, political, recreational, social) which could reasonably conflict with the Company's interests and interfere with the performance of their duties.
- Employees must not use any Company's property, information or position, or opportunities arising from these for personal gains or to compete with or to tarnish the image of the Company.
- Employees should not engage in any business activity, which could be detrimental to, or in competition with any of the Company's business activities.
- All Employees must avoid situations in which their personal interest could conflict with the interest of the Company.
- If, under any circumstance, Employees' personal interests' conflict with those of the Company's, in all such cases the Employee must seek advice from his or her reporting manager/ HR Team.
- For avoidance of doubt, mere financial portfolio investments shall not be considered as activities that conflict with the business of the Company.

### **5.3. Intellectual Property Rights**

- Wissen shall retain all rights, title and interest in any Intellectual Property created, conceived, developed, contributed to or improved upon by its employee during his/her tenure with Wissen. Notwithstanding anything to the contrary, no license with respect to Intellectual Property Rights shall be deemed or implied to be granted by Wissen to the employee.
- The employee shall not reverse-engineer, decompile, or disassemble, modify or copy any methodologies, software or whitepaper article, themes, headlines, or Confidential Information and shall not remove, overprint, deface or change any notice of confidentiality, copyright, trademark, logo, legend or other notices of ownership from any originals or copies of Confidential Information it receives from Wissen and its clients.
- During the employment, whatever gets created, developed, modified in the form of any hardware or software design, engineering, hardware code, software code, hardware and software library, schematic, architectural, layout, protocol, model or any Intellectual Property or document in any format by the employee with or without the assistance or involvement of any other person during the Term using own tools or Wissen's tools and systems will always be the property of Wissen.

### **5.4. Confidentiality of Information**

- As a result of employment with the Company, Employees may be entrusted with confidential information regarding the Company and/or its affiliates, its customers, and suppliers. Upon joining, Employees are required to separately read, acknowledge, and sign the 'Confidentiality Agreement' that explicitly mentions the terms and conditions of the confidentiality obligation and maintaining the sanctity of the confidential information as a part of intellectual property of the Company.

## **5.5. Integrity of Financial Information**

- Many Employees participate in accounting processes that directly impact the integrity of external financial statements and internal management reports. All such Employees have a responsibility to ensure that all transactions are recorded in Company's accounts accurately and promptly and they must immediately report any known inaccuracies.
- Misrepresentations by Employees that result from intentional acts that may conceal or obscure the true nature of a business transaction are clear contraventions of this Policy.

## **5.6. Protection and Use of Company Property**

- All Employees of the Company are responsible for protecting and taking reasonable steps to prevent the theft or misuse of, or damage to Company's assets, including all kinds of physical assets, movable, immovable and tangible property, corporate information and intellectual property (such as inventions, copyrights, patents, trademarks and technology) and intellectual property used in carrying out their responsibilities.
- All Employees must use all equipment's, tools, materials, supplies, and Employee time only for Company's legitimate business interests. Company's property must not be borrowed, loaned, or disposed of, except in accordance with appropriate Company's policies. All Employees must use and maintain Company's property and resources efficiently and with due care and diligence.

## **5.7. Acceptance of Gifts and Other Benefits**

- Employees should not give or accept gifts, entertainment, or any other personal benefit or privilege that would in any way influence or appear to influence any business decision.
- Accepting money, gifts, entertainment, loans or any other benefit or preferential treatment from any existing or potential customer, supplier or business associate of the Company, is strictly prohibited, except occasional gifts and mementos as part of customary business practice.
- As a general principle, gifts of minor estimated value (e.g. pens, golf balls, desk diaries) are acceptable.
- Where the estimated value of the gift is over Rs.1000, such gift should be declined.
- All other prospective offers of gifts or entertainment falling outside the foregoing guideline, but which reflect customary and transparent business practice in a particular market, may be accepted.
- However, in case of doubts, the Employee must refer the case to his/her reporting manager or the HR Department who will decide on the action to be taken.
- It is unacceptable to directly or indirectly offer, pay, solicit, or accept any kind of inducements or bribes.
- Any attempted transaction of this nature should be immediately reported to the CEO.
- The funds and resources of the Company shall not be used directly or indirectly for any such purpose.
- Employees should also refer to the ABC Policy of Wissen

## **5.8. Whole Time and Attention**

- All Employees shall devote their time and their best efforts to promote the Company's business and may not without the prior written consent of the Company (and subject to any terms and conditions as may be imposed by the Company) engage or be interested in (whether directly or indirectly) in any other business, employment or vocation for pecuniary gain.

## **5.9. Harassment**

- Wissen has a zero-tolerance policy for harassment and discrimination on account of age, physical disability, marital status, race, religion, caste, sex, sexual orientation or gender identity.
- The Company is committed to providing a work environment that is free of inappropriate behavior of all kinds. Employees are responsible for supporting the Company in its endeavor to protect others from any form of such harassment.

## **5.10. Modern Slavery**

- The Company upholds the highest ethical standards by strictly prohibiting child/forced labor, with a minimum employment age of 18 years. Our HR and Recruitment teams diligently enforce this policy, ensuring compliance. Wissen also firmly opposes forced labor and human trafficking in all its operations.

## **5.11. Freedom of Association and Collective Bargaining**

- Wissen Infotech respects employees' rights to express their opinions, associate freely, and participate in lawful employment-related activities in accordance with applicable laws and company policies. While formal trade unions or collective bargaining structures are not currently established, the company remains open to supporting these rights should legal frameworks evolve. Employees are encouraged to voice concerns and engage in open dialogue without fear of retaliation, fostering a culture of transparency and mutual respect.

## **5.12. Non-Discrimination**

- At Wissen, every employee is considered as a unique individual and a valuable contributor with their own unique skill and experience. Any employee who feels that he/she has faced any discrimination should reach out to the HR immediately and every such complaint is investigated and resolved appropriately. We believe and ensure that everyone is treated equally regardless of age, gender, religion, marital status, nationality/citizenship, language, race, pregnancy, sexual orientation, physical disability or any other characteristic as protected by the law.
- Any individual, irrespective of any kind of disability and capable of performing the core functions of their role, with or without reasonable accommodation, is entitled to the same stature, rights, respect and protection as other employees.



### 5.13. Right to Work in a Professional Environment

- Wissen provides the required atmosphere for every employee to work in a professional environment where their knowledge, skills, and abilities are considered as the critical factors for their performance and success. Wissen provides guidelines for appropriate workplace behavior to help everyone be more conscientious and considerate of co-workers and the work environment. We place emphasis on the importance of promoting equal opportunities that comes by maintaining standards of propriety and treating everyone professionally, and act without bias.

### 5.14. Grievance Redressal

- It has an open-door Grievance Redressal process. The management asserts that no employee is prevented from going to it directly with his grievance and even meet the management in an effort to have his/her grievance properly attended.
- The aggrieved employee verbally explains his/her grievance to the immediate Reporting manager/Project manager in a discussion specifically arranged for this purpose. The grievance can be settled if the employee is happy with the response given by his/her Reporting manager/ Project manager. If the employee is not satisfied, then he reaches out to his/her Functional Head. If the resolution provided by the Functional head is not satisfactory, then the employee brings it to HR's notice. The HR convenes a meeting between the parties involved and aims for amicable resolution. If the employee is still not happy, then it is put forth to the Management since the decisions of the manager/Project manager and the Functional head have not solved the problem. The Management is apprised of the situation and a formal meeting is convened between the aggrieved employee and the parties involved following which the situation is analyzed and response provided accordingly. The decision of the management is final.
- If an employee encounters a highly serious issue that requires urgent resolution, you can bypass the usual grievance process and directly write to [grievances@wisseninfotech.com](mailto:grievances@wisseninfotech.com). This channel is dedicated to handling critical matters with the utmost priority and confidentiality.
- Wissen's proven methods of addressing and resolving all of its employees' suggestions/complaints/requests/grievances ensure that there is no additional need for the employees to form or approach any other internal or external forum.
- Wissen respects employees' right to freedom of association and collective bargaining, in accordance with applicable laws. While no collective bargaining agreements are currently in place, we remain open to engaging in such processes should employees choose to pursue them.

### 5.15. Alcohol & Substance Abuse

- The use or possession of alcohol, illegal drugs, and other controlled substances in the workplace and being under the influence of these substances on the job and during working hours is strictly prohibited.

- However, possession of prescription medication for medical treatment is permitted.

### 5.16. Fraud

- Fraud — or the act or intent to cheat, trick, steal, deceive, or lie — is both dishonest and, in most cases, criminal. Intentional acts of fraud are subject to strict disciplinary action, including dismissal and possible civil and/or criminal action against the concerned Employee.
- Some examples of Fraud include:
  - Submitting false expense reports;
  - Forging or altering checks;
  - Misappropriating assets or misusing Company's property;
  - Unauthorized handling or reporting of transactions;
  - Making any entry on Company records or financial statements that is not accurate and in accordance with proper accounting standards

### 5.17. Anti-Competitive Practices

- Wissen Infotech is committed to conducting business in compliance with all applicable competition laws and regulations. As an employee, you are required to uphold these principles and avoid any activities that could be construed as anti-competitive.
  - Employees must not engage in any activities that may result in anti-competitive behavior like price fixing, bid rigging etc.
  - Employees must ensure all business dealings comply with competition laws.
  - Any suspected anti-competitive behavior must be reported immediately to the Compliance team at [ethics@wisseninfotech.com](mailto:ethics@wisseninfotech.com).
  - Training will be provided to help employees understand and adhere to competition laws.
- Violation of this clause may result in disciplinary action, including termination of employment, and could lead to legal consequences for both the employee and the Company.
- By adhering to this policy, Wissen Infotech ensures ethical business practices and maintains trust with customers, partners, and regulators.

### 5.18. Whistleblower Policy

- Wissen Infotech is committed to maintaining the highest standards of integrity, transparency, and ethical conduct. To support this commitment, the Whistleblower Policy provides employees with a safe and confidential avenue to report any concerns related to misconduct or unethical practices.
- The policy covers the reporting of concerns including, but not limited to:
  - Fraud, corruption, or financial irregularities
  - Violations of company policies or laws
  - Harassment, discrimination, or abuse
  - Health, safety, or environmental risks

- All whistleblower reports will be treated with strict confidentiality. Employees raising concerns in good faith are protected from retaliation, discrimination, or harassment.

## 5.19. Compliance with Laws and Agreements

- All Employees shall conduct business in compliance with all applicable laws and regulations of the District, State or Country.

## 5.20. Health, Safety and Environment

- All Employees shall comply with the company health and safety norms as communicated to them from time to time. Employees shall bring to the management's attention any workplace safety or health hazard.

## 5.21. Misconduct And Non-Conformance with The Policy

- Non-observance of this Policy shall be construed as misconduct that could warrant disciplinary action, including dismissal in deserving cases. The decision in this regard will lie with the CEO.

## 5.22. Reporting A Concern

- You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes violation of Code of Conduct and Ethics, or if you have any other queries, these should be reported to the Compliance team by,
  - Calling the Ethics Helpline on +91 9966855682
  - Writing an email to [ethics@wisseninfotech.com](mailto:ethics@wisseninfotech.com)

## 5.23. Non - Retaliation

Wissen prohibits any form of retaliation against employees who, for lawful purposes, make a complaint regarding a suspected ethics violation. Wissen also prohibits any form of retaliation against employees who provide information, cause information to be provided, or assist in an investigation conducted by the Company or any governmental body, regarding a possible violation of any law or regulation relating to fraud.

If an employee believes that he or she has been retaliated against (including threatened or harassed) in violation of this policy, he or she should immediately report it to the CEO/Compliance Officer/Ethics Helpline. Once an employee reports retaliation prohibited by this policy, Wissen will promptly investigate the matter. The investigation will be handled as discreetly as reasonably possible, allowing for a fair investigation and any necessary corrective action. Appropriate corrective action will be taken whenever a violation of this policy is determined to have occurred. Depending on the nature of the violation, the offending individual may be subject to disciplinary action as deemed fit by the relevant authority including termination. In addition, anyone who interferes with an investigation, or provides information in an investigation that the individual knows to be untrue or inaccurate, will

be subject to disciplinary action, up to and including termination of employment. Retaliation against employees who in good faith file a complaint or participate in an investigation is strictly prohibited.

Any exceptions to the norms laid down in this Policy may be at the discretion of the CEO.

## **5.24. ACCOUNTABILITY**

It is a condition of an appointment and/ or employment that all Employees and Suppliers must always understand and adhere to the Company's Code of Conduct and abide by the standards, requirements and procedures laid down herein. They must:

- Commit to individual conduct in accordance with this Policy.
- Observe both, the spirit and the letter of the law in their dealings on Company's behalf.
- Recognize Company's responsibility to its customers, employees, and Company's business relations, and to society. Assess priorities in the context of discharging these responsibilities appropriately on Company's behalf.
- Conduct themselves as responsible members of society, giving due regard to health, safety, and environmental concerns, and human rights, in the operation of Company's business.
- Report any suspected breach of the law or this Policy via email ([ethics@wisseninfotech.com](mailto:ethics@wisseninfotech.com)).

## **5.25. AMENDMENTS**

The Company reserves the rights to change/ amend / add /delete/ modify this Policy in whole or in part, at any time without assigning any reason whatsoever. The Employees acknowledge that they will not be personally advised of any such change/ amendment / addition /deletion/ modification. The Employees are advised to check for any such change/ amendment / addition /deletion/ modification regularly. The Employees hereby unconditionally agree to all such changes / amendments / additions / deletions / modifications.