



CREATING **WOW!**

Excellence

Ownership

Compassion

Openness

Code of Conduct Guidelines



Nature of Document	
Confidential	
Public	
Internal	✓



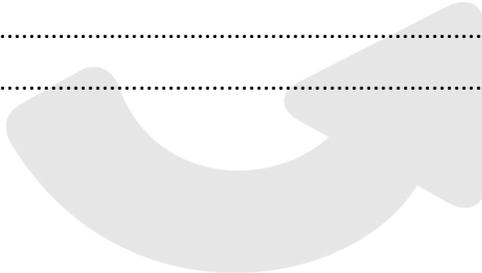
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1.0 Policy Statement

InfoBeans Code of Conduct sets forth our core values, shared responsibilities and work commitments. We are committed to conducting business by the highest standards of ethics, integrity and behaviour when dealing with our clients, colleagues and other stakeholders.

Ethical behaviour is an essential part of each member's position with InfoBeans and is a personal responsibility that should be taken very seriously. We need and expect each Team Member to be accountable for their work and behaviour and support the values, principles, and standards upon which InfoBeans business reputation rests.

2.0 Purpose

The purpose of this policy is to share the guidelines for remote working during unforeseen emergencies, expectations from the Team Members working remotely, and the arrangements necessary to support remote working.

The Code of Conduct expresses InfoBeans commitment to conducting business ethically. It explains what it means to act with integrity and transparency in everything we do and in accordance with our unique culture and values. It is also the first step for you to clarify any questions relating to ethical conduct. Our Code, however, cannot possibly address every situation we face at work. Therefore, the Code is by no means a substitute CODE OF CONDUCT for our good judgment. We must remember that each of us is responsible for our actions and that the ethical choice is always the best choice.

In addition to the Code, every Team Member should also be aware of all Company policies and procedures applicable to our work. You may refer to the Policy Deck, a repository of all our policies.

3.0 Scope and Applicability

This Policy extends to all 'Team Members' of the Organization including permanent, contract, part-time and trainee of InfoBeans Technologies Limited, irrespective of their work locations within India or overseas.

4.0 Our Culture Pillars



Excellence: Quality of deliverables



Ownership: Commitment



Compassion: Kindness



Openness: Transparent communication



5.0 Who must follow the Code?

As members of the InfoBeans family, every member must follow not only the letter of the Code, but its intent and spirit as well. This means we should:

- Understand the areas covered by the Code, Company policies and procedures, and laws that apply to our job.
- Follow the legal requirements of all locations where we do business.
- Conduct ourselves in ways that are consistent with the Code, Company policies and procedures, and laws.
- Speak up if we have concerns or suspect violations of the Code, Company policies and procedures, or laws
- When requested, certify that you have reviewed, understand and agree to follow the Code
- Understand that following the Code is a mandatory part of our job

5.1 Team Member's Responsibility

- Be familiar with, understand, and uphold the Code and be aware of policies that are relevant to your job responsibilities.
- Report any suspected violations of this Code, Company policies, or law
- No matter what our role is, each one of us is expected to lead when it is a question of ethics and be accountable for our actions.

5.2 Manager's Responsibility

- Promote a culture of compliance in which team members understand their responsibilities and
- Feel comfortable asking questions or reporting suspected violations without fear of retaliation
- Foster a spirit of ethics, integrity, and lawfulness by personally leading compliance efforts
- Never retaliate or tolerate retaliation against any individual for making a good faith report
- Ensure that team members understand that business results are never more important than
- ethical conduct and compliance with this Code
- Escalate concerns when additional assistance is needed
- Actively support ethics and compliance awareness and training programs.
- Have open avenues for communication.
- Listen and respond fairly to employee concerns

**Any Manager who directs or approves of any conduct in violation of this Code, Company policies, or law, or who has knowledge of such conduct and does not immediately report it, will be subject to disciplinary action.*

6.0 Ethics in Business Activities

At InfoBeans, every team member is committed to conduct business and their responsibilities to the highest ethical standards. InfoBeans' culture pillars bind us together and keep us working towards Creating WOW.

6.1 Prevent Corruption

We at InfoBeans believe that our success is based on the quality of our services we deliver to our clients and never on unethical or illegal behaviour. We do not corruptly offer, directly or indirectly, anything of value, including cash, gifts, favors', charitable and political contributions, or hospitality/entertainment, to a government official or commercial partners including customers or their representatives with an intent to obtain or retain business; influence business decisions; secure an unfair advantage. This includes bribes, kickbacks and facilitation payments.

6.1.1 Forms of Bribery and Repercussions

Bribery is offering or giving something of value to influence the recipient's actions improperly. Bribery is illegal everywhere InfoBeans does business, and the consequences for offering or accepting a bribe are severe. You may never offer, authorize, give, promise, or accept any form of a bribe, extortion payment, improper payment, gift, or benefit while working on InfoBeans behalf.

6.1.2 Kickback

A kickback is the return of a sum paid (or due to be paid) as a reward for fostering a business arrangement. Accepting or offering a kickback violates InfoBeans' Code of conduct.

6.1.3 Facilitation Payment

A facilitation payment is a tip or small payment made to a government official to expedite a routine government action—for example, issuing a permit or providing utility service. These payments are illegal in most jurisdictions and are not allowed under InfoBeans' policies. If you observe corrupt practices are occurring within our operations, report your concerns to your manager or Human Resource manager immediately.

We strongly recommend our Team Members to follow anti-bribery and anti-corruption laws wherever you do business. Regardless of what local laws may permit, never offer, pay, promise to pay, or accept anything of value directly or indirectly to influence others' judgment or actions improperly.

6.2 Sole Employment / Outside Employment

The Team Member agrees that she/he shall not work, for profit or without profit, with any other company or individual or work as a freelancer while working at InfoBeans.

During the tenure of employment with InfoBeans, the Team Member shall not engage in any vocation, training, employment, consultancy, business, or any other activity, which conflicts with the interest of the InfoBeans, in any capacity whatsoever either on her/his own or in association with any other individual/firm/institute/body corporate, etc., whether for any consideration or not.

The Team Member agrees will not make use of any InfoBeans resources (including but not limited to computers, Internet, Telephone, Mobile, any handheld device, office premises) for conducting any vocation, training, employment, consultancy, business, or any other for profit or not for profit activity unless authorized explicitly by InfoBeans.

6.3 Avoiding Conflicts of Interest—Financial Investments and Arrangements

Another important type of conflict of interest involves our personal finances. To maintain high integrity standards, we must not hold any personal financial interest in a customer, supplier, or competitor of our Company. If we hold or one of our family members (or other close personal relations) holds a significant financial interest in any customer, supplier, or competitor of InfoBeans. In that case, we must disclose the situation immediately to hr@infobeans.com.

Team Members must also be mindful of certain types of personal borrowing. We must not borrow money from subordinates as this may give rise to a perception of a conflict concerning reviews, assignments, promotions, and compensation decisions.

6.4 Gifts and Entertainment

It goes without saying that all the data on the computer must always be secure. Do not access unauthorized websites. Avoid installing unauthorized software on the computer. If you want to install work-related software, then the best practice is to seek the manager's approval and the IT team's assistance.

The exchange of gifts and entertainment is nothing new in the industry that we operate. It is a traditional way to express gratitude and build relationships. But an overly generous gift can pressure the recipient to return the favour or feel indebted to the giver – with decisions that benefit the giver and create a conflict of interest or perception of a conflict of interest.

When we offer a gift to a customer, a government official or any third party, we should keep the following in mind:

- 6.4.1** It is not done to obtain or retain business or gain an improper advantage in business
- 6.4.2** It is lawful under the laws of the country where the gift is being given and permitted under the policies of the client;
- 6.4.3** It constitutes a bona fide promotion or goodwill expenditure;
- 6.4.4** It is not in the form of cash;
- 6.4.5** The gift is of nominal value (on an individual and aggregate basis);
- 6.4.6** The gift is accurately recorded in the Company's books and records;

6.5 Corporate Opportunity

To remain objective and ethical, we must never pursue opportunities that compete with InfoBeans. Specifically, we must refrain from activities, investments, or associations that compete with InfoBeans or exploit our position with InfoBeans for personal gain. Should we discover a potential business opportunity through our InfoBeans work, we must first inform the Company about it, rather than personally pursuing the opportunity. This same principle extends to helping anyone else, including family members and friends, take personal advantage of an opportunity to compete with InfoBeans.

6.6 Working with Friends and Family

To avoid conflicts of interest and any appearance of favouritism, ensure that you do not work directly for, supervise or make employment decisions about a family member. This includes positions or assignments within the same department and the employment of such individuals in roles with a financial or other dependence or influence (e.g., an auditing or control relationship, or a supervisor / subordinate relationship).

For this reason, InfoBeans team member may not:

- hire, supervise, report to, review, or influence the job evaluation or compensation of another team member with whom they have a close personal relationship;
- participate in or make a procurement decision that could benefit themselves, a relative, or friend.

6.7 Lobbying

If our work includes meetings with government, elected officials, all of which might be construed as 'lobbying', we must be aware that such activities are regulated. We should not claim to represent our Company at such meetings unless the Company specifically designates us to do so. As in all other spheres of our activity, any discussions of this sort should be carried out with high integrity, in line with our Company's values.

7.0 Protecting Company Assets

InfoBeans team members must ensure that the use of Company's assets is reasonable. It is the responsibility of each member to protect the assets and proprietary information of the Company and ensure that the same are used only for business purposes of the Company.

7.1 Confidential Information

Confidential Information is termed as any information team member shall receive, information disclosed to a team member or known, learned, created, or observed by team member not generally known in the trade or industry, about InfoBeans' business activities, services, and processes including but not limited to technology, information concerning sales, advertisement, marketing, research, finances, accounting, methods, processes, business plans, client or supplier records, potential clients or suppliers lists, and client or supplier billing.

The Team Member having access to the Company's confidential information shall strictly be used in connection with the employment as per the agreement under conditions mentioned hereunder:

As long as the Team Member is employed at InfoBeans and even after termination, she/he will, at all times, observe secrecy and confidentiality and will not divulge, disclose or make known to any unauthorized person within or outside InfoBeans, nor he will use any knowledge or information in respect of process, technology, technical trade or business data (including customer information, business plans and like matters) which are necessarily confidential and have come to his/her knowledge and possession.

The Team Member must not remove any above described information in any form whatsoever from the InfoBeans premises, nor copy or transmit the same unless authorized in writing, nor will grant permission to assist, permit entry to, or in any manner co-operate with any unauthorized person for accessing, obtaining, copying, transmitting or removing the above. Even after the cessation of her/his

employment with the InfoBeans, she/he cannot use, divulge, disclose or remove in any manner whatsoever confidential information of the type described above of which she/he is in possession whilst in service. The Team Member recognizes that InfoBeans has received and will receive proprietary and confidential information from third parties that InfoBeans is required to treat as confidential and to use only for specified purposes. During employment and subsequent thereto, the Team Member will hold such information in the strictest confidence and will not disclose such information other than as permitted by the Company with such parties.

7.2 Improper Opportunities

When we receive information as part of our job, we should not trade with it for our personal benefit. Neither should we pass on the information to our friends and family members or indirectly compete with the Company. Information obtained as part of our job should not be taken advantage of even after leaving the organization.

7.3 Use of company assets

Any ideas, invention or improvements conceived, developed or first put to practice by the Team Member in the course of the employment and all copyrights in any works created by the Team Member in the course of employment including all the Confidential Information embodied in any of the foregoing and all copies of the foregoing shall be sole and exclusive property of InfoBeans.

All software and software products and any derivative products produced by the Team Member for InfoBeans shall remain the property of InfoBeans and InfoBeans shall hold sole and exclusive rights to all copyrights to them.

Computer hardware, software, data, and facilities are valuable resources that need protection from potential destruction, theft, or misuse. These resources may also include confidential client or InfoBeans information that requires safeguarding. It is your responsibility to prevent unauthorized access through ID badges, passwords, other security codes, and physical security measures (such as using computer cable locks, not leaving computers unattended in cars, and other standard precautions).

7.4 Call Physical Access Control

InfoBeans has developed procedures covering physical access control to ensure the privacy of communications, maintenance of the security of the Company communication equipment, and safeguard Company assets from theft, misuse and destruction. The Team Members are responsible for complying with the security policies in their respective locations. They must not defeat or cause to defeat the purpose for which the access control was implemented.

7.5 Expense Claim

The Team Members have an obligation to each other and to the Company to comply with InfoBeans business expenses and reimbursement policies and practices. Your manager must authorize all business-related expense claims before being incurred. The Company will not reimburse personal expenses.

7.6 Communicating About InfoBeans

As a publicly traded company, InfoBeans has a responsibility to disclose information to the public that is completely accurate.

The Team Members must not speak on behalf of InfoBeans, our customers or competitors, or our industry with any member of the media or investment community (including all "market professionals" such as securities analysts, institutional investors, investment advisors, brokers, dealers, and security holders) unless we are authorized to do so.

All public disclosures, including forecasts, press releases, speeches, and other communications must be accurate, timely, and representative of the facts.

If any media person, analyst, or investor approaches the Team Member to speak on behalf of our Company, our customers or competitors, or our industry; in that case, she/he should direct those queries to the hr@infobeans.com.

7.7 Discrimination and Harassment

At InfoBeans, we strive to provide a work environment free of discrimination and harassment. We are an equal opportunity employer, and employment decisions are based on merit and business needs.

We are committed to following fair employment practices that provide equal opportunities to all team members. We never discriminate against a person's legally protected characteristics, such as race, colour, religion, gender, gender identity, age, national origin, sexual orientation, marital status, disability status, or veteran status when we make employment decisions including recruiting, hiring, training, promotion, termination, or providing other terms and conditions of employment.

We never tolerate discriminatory conduct, abuse of authority, or harassment of any kind, including that of a sexual nature. The Team Members must refrain from making jokes, slurs, or other remarks about a person's legally protected characteristics as applicable in a specific country, or those of a sexual nature. At no time we allow, encourage or create an offensive, violent, discriminatory, abusive, or hostile environment.

Similarly, we may not retaliate against a person who makes a report of discrimination or harassment in good faith, or who participates in an investigation if witnessing or experiencing discrimination, intimidation, harassment, or retaliation; we should promptly report the behaviour.

7.8 A safe place to work

All of us need a healthy and safe work environment to work effectively. All forms of substance abuse and the use or distribution of drugs and alcohol while at work are prohibited and use of weapons/firearms or ammunition while on the Company's business is prohibited. All of us should be safe at our place of work. Should you observe any unsafe situations at work, please reach out to the hr@infobeans.com

7.9 Using Technology, the right way

We must protect InfoBeans information systems from unauthorized access or modification. When we access client information systems, we should familiarize ourselves with any additional contractual obligations that may apply.

InfoBeans assets like information systems and the messages communicated with them are the sole property of InfoBeans. Where permitted, the Company reserves the right to monitor, audit, and inspect our use of these resources. The Company may also block emails containing security-sensitive

content. If we know or suspect the use of InfoBeans or client assets in violation of this Code or any policy, we must disclose the issue to our manager or the human resource department. When sending business communications in our capacity as InfoBeans team member, we must maintain a professional tone, discuss only appropriate subjects and not threaten, libel, or defame any other person or Company. We should be thoughtful in all our communications and dealings with others, including on social media

8.0 Committed to Customer and Suppliers

Our clients, stockholders, and communities depend on our commitment to perform with the highest level of integrity.

8.1 Fair Dealings

To compete fairly in the marketplace, we must show the same respect for the confidential information of our competitors that we show for our own. This means we may only gather competitive information lawfully and ethically, never through deception or misrepresentation.

We should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

We must comply with the countries' antitrust and competition laws where we do business. In general, we must avoid agreements, understandings, or plans with competitors that limit or restrict competition, including price-fixing and allocation of markets.

8.2 Conducting ethical sales and Marketing

We never take unfair advantage of potential or current customers or vendors through manipulation, concealment, abuse of confidential information, misrepresentation of facts, or any other unfair dealing practice. Our communications about our services, whether oral or in written promotional materials, presentations, or slide decks should always meet our high standards of accuracy and integrity.

8.3 Confidential Information of Clients and Third Parties

The Confidentiality and Nondisclosure Agreement we sign when we join the Company details our confidentiality obligations to the Company and its clients. We have access to significant amounts of client information that may not be available to the public. We are required to preserve the confidentiality of information obtained in client service. Information of a confidential, private and sensitive nature must be used responsibly and controlled and protected to prevent its prohibited, arbitrary or careless disclosure. Unless the client has provided its specific consent, which should preferably be in writing, or there is a legal or professional right or duty to process or disclose, we are prohibited from processing or disclosing confidential client information.

Confidential or proprietary information including personal information about clients, our organization, or other parties, which has been gained through employment or affiliation with InfoBeans, may not be used for personal advantage or for the benefit of third parties. We are committed to protecting the confidentiality of processing such personal information by implementing adequate technical and organizational measures. All agents, consultants, suppliers, contractors, are made aware of their responsibility to use, or process personal information, unless authorized by law and/or contractually agreed.

8.4 Driving Quality

We uphold strict standards for quality when working under our client contracts. As InfoBeans' team members, we are each responsible for knowing and complying with contractual obligations applicable to our work. This means we cannot deviate from contractual specifications without the proper approvals. Properly recording and categorizing all costs to the appropriate accounts and customers and carefully reviewing all documentation to ensure its accuracy before it is submitted to our customers is a fundamental part of delivering quality service.

8.5 Industrial Espionage

Our commitment to fairness includes respecting our competitors' rights and abiding by all applicable laws. As a lawful competitor and to help ensure the competitive marketplace's integrity, we must respect our competitors. Take care that we do not unlawfully use the information, material, products, intellectual property, or proprietary or confidential information of anyone including suppliers, customers, business partners or competitors.

9.0 Creating and maintaining accurate and complete records

The Company is required to keep books, records and accounts, which, in reasonable detail, accurately and fairly reflect the transactions and dispositions of Company assets. Every team member is accountable for the accuracy of their records and reports.

9.1 Maintaining accurate records

We are all responsible for upholding all internal controls and for the accuracy of the Company's books and records, including timesheets, travel and expense reports, and financial statements we create and maintain.

The integrity of our financial transactions and records is critical to our business's operation. Our shareholders' trust is based on their confidence in the accurate recording of our financial transactions. Additionally, as a listed company, we are bound by certain standards for accurate financial reporting, and we are required to have appropriate internal controls and procedures. If you have responsibility for or any involvement in financial reporting or accounting; in that case, you should have a proper understanding of, and you should seek in good faith to adhere to, relevant accounting and financial reporting principles, standards, laws, rules and regulations and the Company's financial and accounting policies, controls and procedures.

Additionally, you should take every precaution, whether you are otherwise required to be familiar with finance or accounting matters or not, to ensure that every business record or report you deal with is honestly filled in, accurate, complete and reliable.

9.2 Ensuring Accurate Public Disclosures

InfoBeans is committed to providing full, fair, accurate, timely, and clear disclosures in reports and documents that we file with or submit to our regulators and in our other public communications. To enable this, we must ensure that we comply with our disclosure controls and procedures, and our internal control over financial reporting.

9.3 Auditors

Our outside auditors have a duty to review our records in a fair and accurate manner. We must cooperate with them in good faith and in accordance with the law. We must never mislead them in any manner regarding financial records, processes, controls or procedures, or other matters which they may enquire about.

9.4 Prohibition Against Money Laundering

As part of our commitment to accurate recordkeeping, we must be aware that people involved in criminal activity may attempt to enter into transactions with our Company to "launder" the proceeds of their illegal activities to hide the funds or make them appear to be from legitimate activities. InfoBeans is committed to conducting business only with reputable customers involved in legitimate business activities, with funds derived from legitimate, lawful sources.

InfoBeans team members can help ensure compliance with all applicable money laundering laws and regulations by:

9.4.1 Working with the appropriate InfoBeans team (such as finance, accounting, and compliance) to perform proper due diligence on prospective customers, agents, and business partners to ensure that they are involved in legitimate business activities, and their funds come from legitimate sources.

9.4.2 Raise concern if any customer, agent, or proposed business partner is reluctant to provide complete information, provides insufficient, false, or suspicious information, or is anxious to avoid reporting or recordkeeping requirements.

9.5 Interaction with regulators

We must fully and truthfully cooperate with any examination or request for information from a regulator or law enforcement agency.

10.0 Report Violation

If any team member observes violations of 'InfoBeans' values and principles, you are encouraged to report such incidents to hr@infobeans.com. We will ensure that you are not retaliated because of any report you raised in good faith. InfoBeans does not tolerate any form of retaliation (whether by a manager, co-worker or otherwise) against an individual for reporting an integrity concern. This protection also extends to anyone who assists with or cooperates in an investigation or report of an integrity concern or question. We support those who support our values.

Reach out to your manager or Human Resources manager to report:

- The inaccuracy of financial records
- Accounting and auditing irregularities
- Bribery, corruption or illegal payments
- Criminal conduct and violations of law
- Discrimination and harassment
- Conflicts of interest

11.0 Investigation of Violation

We have a disciplinary committee and a process to review and investigate all potential legal or Code violations. Investigations will be conducted in confidence and will be respectful and fair. If an investigation substantiates an allegation, the disciplinary committee will review the findings and determine the final outcome.

11.1 Consequences of Violation of The Code

Failure to comply with the Code may result in severe consequences, which could include internal disciplinary action or termination of employment.

12.0 Review of Code

The Code shall be reviewed and evaluated from time to time and generally on an annual basis to determine whether this Code effectively ensures that InfoBeans business and affairs are conducted with honesty, integrity and in accordance with the highest ethical and legal standards.

All the team members need to strictly adhere to the code of conduct guidelines. Any deviation found can lead to required action against the team member and in severe situation can lead to termination of employment.