



Policy on Ethics and Code of Conduct

Decisive Analytical Systems Pvt. Ltd.



Decisive Analytical Systems Pvt. Ltd.

Document Information

Document Title	Policy on Ethics and Code of Conduct
Release Date	31 March 2020
Version Number	1.0
Document Owner	Head of HR
Author	Ethics Group
Document Approval	Vijay Chander S.
Approval Date	31 March 2020
Review Plan	To be reviewed annually

Decisive Analytical Systems Pvt. Ltd.

Table of Contents

1. Scope.....	4
2. Effective Date	4
3. Decisive's commitment to Human Rights	4
4. People.....	4
5. Conflict of Interest.....	5
6. Ethics and Supplier/Customer Relations.....	5
7. Respect for Customer Privacy.....	6
8. Respect for Third Party Intellectual Property and Confidential Information	6
9. Compliance with Law	6
10. Compliance with Applicable Anti-Bribery Law.....	7
11. Our Commitment to Sustainability.....	7

1. SCOPE

1.1 This Code of Ethics and Conduct applies to all Directors, Employees, Contractors, Vendors, Partners and suppliers of Decisive Analytical Systems Private Limited ("Decisive" or "Company").

1.2 The Company has a "zero tolerance" policy for non-compliance with the Code. The Company's employees who violate the Code are liable for disciplinary action up to the termination of employment and criminal prosecution, depending upon the severity and frequency of the violation.

2. EFFECTIVE DATE

The policy comes into immediate effect.

3. DECISIVE'S COMMITMENT TO HUMAN RIGHTS

Decisive is committed to respect human rights worldwide. To that end, the Company adopts the following standards and seeks partners who equally believe in:

- Equal opportunity for employees in all grades, independently of skin color, race, gender, sexual identity, age, ethnicity, nationality, sexual orientation, marital status, disability or any other characteristics protected under the law;
- Secure and healthy workplace where human health and the environment are protected;
- The payment of employee compensation that will respect local laws being fair according to the employee's skills and the function to be performed in the Company, in addition to providing opportunities to improve their competencies and skills;
- Respect for employees' right to legal association;
- Cooperation with governments and communities where we do business, so as to improve the level of education, culture, economy, and social welfare of these communities.

4. PEOPLE

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



- A commitment to maintaining the highest standards of integrity and honesty in their work and while dealing with client organizations including their employees, partners and other associates.
- An adherence to ethical and legal standards to be maintained in business;
- To ensure that there is no misrepresentation of fact

5. CONFLICT OF INTEREST

Employees must avoid personal interests or financial activities that conflict, or appear to conflict, with Decisive's interests or that influence, or appear to influence, their judgment or actions in performing their duties as employees. Such conflicts may arise in a number of situations. It is not possible to cover all of them in this Code nor will it always be easy to distinguish proper conduct from improper. If you have doubts about any situation, ask your supervisor or HR before you take action.

The following guidelines apply to common situations where there is a conflict of interest

5.1 Relationships with suppliers, dealers, customers and other business partners

Any employee who owns or acquires, directly or indirectly, an interest in any concern regarding the procurement of goods or services, or competing with the Company, sales distribution with dealers or other business partners, is required to disclose the full detail concerning such interest or relationship. In such circumstances, a conflict may arise if such employee is in a position to influence decisions with respect to any Company transaction involving a business partner; if his or her other interest or relationship is such that it might bring into question his or her continuing ability to make impartial judgment in the Company's best interest. Before you investing, you should seek advice of Decisive's HR Department as well as your manager and obtain prior written approval.

5.2 Family

Notify your supervisor and obtain approval from the CEO of the Company before you start negotiations on behalf of Decisive with any company where, you, a family member, or friend has an interest that might in any way benefit from your actions or their actions.

6. ETHICS AND SUPPLIER/CUSTOMER RELATIONS

Our purpose is to ensure continuous and reliable sources of supply. It is essential to conduct honest negotiations with customers and suppliers to maintain strong, lasting relationships with them. As a consequence, we regard our suppliers as

partners and we expect them to realize reasonable profits in our dealings together. We consider all prospective suppliers in a manner that is fair and consistent, making our decisions based on objective criteria such as price and quality, in addition to the supplier's reliability and integrity.

We treat every customer with the same business criteria. Giving or taking a "kickback" or payment of any kind as a means to secure business is forbidden which addresses our responsibility to comply with anti-bribery, competition, and anti-trust laws.

7. RESPECT FOR CUSTOMER PRIVACY

We respect and honor our customer's right to privacy. Decisive collects, processes, utilizes and maintains customer information in accordance with applicable laws, including the laws that cover the collection and use of personal information of minors, and we make all reasonable efforts to safeguard such information.

Our policy is to not share customers' personal information unless it is required for providing the services our customers need, or to remain in compliance with applicable laws and regulations.

8. RESPECT FOR THIRD PARTY INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Decisive will not willingly infringe upon the intellectual property rights of third parties. We respect the intellectual property and the confidential information of third parties. This aspect is particularly important if the employee is in possession of intellectual property and confidential information from a former employer.

9. COMPLIANCE WITH LAW

We abide by all the laws that are applicable to Decisive's business. In no circumstances shall the employees of the Company be allowed, either directly or indirectly, to engage in or otherwise be concerned with any transaction, practice, method, or arrangement which is corrupt, illegal, dishonest or improper. The business of the Company and the conduct of its directors, management staff and employees in the course of the business and operations of the Company shall at all times be conducted in accordance with all applicable Laws, rules, and regulations.

10. COMPLIANCE WITH APPLICABLE ANTI-BRIBERY LAW

The Prevention of Corruption Act, 1988 prohibits the direct and indirect offer, payment, solicitation, or acceptance of bribes or similar facilitating payment in any form is unacceptable – therefore all the employees, directors and other associates are expected to follow this doctrine – *do not offer and take improper benefits*.

11. OUR COMMITMENT TO SUSTAINABILITY

At Decisive, sustainability is a key aspect of business. Our sustainability policy is to ensure that Company business will consistently and responsibly increase for the benefit of the people we serve: employees, shareholders and all stakeholders around the globe as we promote the wellbeing of future generations.