



CODE OF CONDUCT POLICY

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INTRODUCTION

Smartworld Developers Private Limited and its associates, affiliates, subsidiaries, Joint ventures (“**We**,” “**us**” “**Smartworld**” or “the **Company**”) are committed to acting transparent, fairly, ethically and with integrity in all its business operations. This includes compliance with applicable laws prohibiting improper payments, gifts or inducement of any kind or form from any person.

It serves as a guiding framework for the management, directors, employees and all other stakeholders to uphold the highest standards of professionalism and ethical conduct.

We encourage all individuals affiliated with Smartworld to familiarize themselves with this Code and to actively promote a culture of compliance and accountability. Together, we can uphold the highest standards of conduct and demonstrate our dedication to ethical business practices and mutual respect.

The purpose of this COC is to promote conduct of business ethically in an efficient and transparent manner and to meet its obligations with shareholders and all other stakeholders. This Code is also a tool in carrying out the Company’s social responsibility in a more effective manner in accordance with the regulatory compliance and laws as applicable. This Code sets out a broad policy for one’s conduct in dealing with the Company, fellow directors and employees and the external environment in which the Company operates.

PLEDGE

We, the people of Smartworld Developers Private Limited (Smartworld), are committed to fostering a work environment that is free from discrimination based on caste, colour, creed, religion, gender, race, or any other personal characteristic. We pledge to uphold the values of respect, integrity, and inclusiveness, ensuring that every individual is treated with dignity and fairness. We provide a safe and supportive workplace where all employees can thrive, report any unethical or illicit conduct without the fear of retaliation, and contribute to the success of the organization. Through this commitment, we aim to create a culture of equality and mutual respect that drives both personal and professional growth for everyone at Smartworld.

KEY DEFINITIONS

Channel Partner - A Channel Partner includes any third-party organization or individual or any individual directly or indirectly associated with such party that collaborates with Smartworld to promote, sell, or distribute its products or services. This includes but not limited to resellers, distributors, service providers, and commission agents etc. Channel Partners must adhere to the company’s ethical standards and compliance requirements as outlined in this policy.

Code of Conduct (CoC) Committee: The CoC Committee is a group of individuals (including Ethics officer) formulated in accordance with the Board resolution to ensure the Governance of Code of Conduct and take necessary actions including actions against the issues arise under the policy. It is to be noted that CoC Committee shall be termed as Steering Committee for the purpose of Whistleblower policy of the Company.

Stakeholders - A Stakeholder refers to any individual, group, or entity that has an interest in or is affected by the activities, decisions, and performance of Smartworld. This includes but not limited to employees, customers, shareholders, contractors, suppliers, consultants, channel partners, business partners, associates, affiliates, regulators, and the broader community.

Directors - A member on the Board of Smartworld in terms of the Companies Act, 2013.

Employees – Employees include all individuals whether on-roll or off-roll, interns, trainees, consultants or directors of the Company working at the various business locations including project sites of the Company.

Ethics officer – Ethics officer means the individual, part of the Code of Conduct Committee, who is authorized to receive the matters under the policy as initial point of contact and act on behalf of the Committee. Please note that Ethics Officer shall be named as 'Ombudsperson' for the purpose of Whistleblower Policy of the Company.

Relative - A "relative" refers to any individual connected to another through various family relationships, including blood relations, marital ties, and those established by adoption either Maternal or Paternal. This encompasses parents, children, siblings, and their respective spouses, as well as step-relations such as step-parents, step-children, and step-siblings. The term also covers in-laws, such as a son's wife, daughter's husband, and vice versa. Additionally, it includes individuals related through a Hindu Undivided Family (HUF), Corporate relations etc.

ADHERING TO THE CODE OF CONDUCT

Adhering to the Code of Conduct is essential for maintaining the company's reputation and upholding its core values. By following the guidelines and expectations outlined in the code of Conduct, employees and stakeholders can ensure that they are conducting business in an ethical and responsible manner. Failure to adhere to the Code of Conduct can result in negative consequences, including legal, financial penalties, and other reputational damage to the company.

This Code does not encompass all potential forms of inappropriate behaviour or actions, and it is must that Management, Directors, Employees and all other Stakeholders ensure and exercise their best judgment in adhering to the principles outlined in the Code.

SCOPE OF THE CODE OF CONDUCT

Our Code of Conduct applies to all individuals associated with Smartworld, including but not limited to management, employees, contractors, consultants, vendors, suppliers, partners, and volunteers. This Code governs behaviour in all surroundings inside or outside the work premises, including but not limited to offices, remote work locations, client sites, project sites, Sales gallery, conferences, offsites and social events organized or sponsored by Smartworld.

The principles and expectations outlined in this Code extend to all interactions and communications, whether internal or external, and encompass all forms of professional conduct, including verbal and written communication, electronic communication, and behaviour in person and online.

Additionally, our Code applies to interactions with clients, customers, vendors, partners, competitors, consultants, regulators, Government agencies, and any other third parties with whom individuals associated with Smartworld engage while performing their duties.

While the Code primarily focuses on behaviour within the professional context, it also addresses expectations for personal conduct that may impact the organization's reputation or relationships with stakeholders. As such, individuals are expected to uphold the principles and values articulated in the Code both during and outside of working hours, when their actions may reflect upon Smartworld.

It's important to note that while the Code provides overarching guidance, specific departments or teams within the organization may have additional policies or guidelines tailored to their roles or responsibilities. In such cases, individuals are expected to adhere to both the Code of Conduct and any

supplementary policies relevant to their work., however it may note that the Code of Conduct policy shall supersede any other additional policy, in place in case of any conflict arise.

By establishing a comprehensive scope, our Code of Conduct ensures that all individuals associated with Smartworld understand their obligations and responsibilities and are held accountable for their conduct in all professional settings.

CONSEQUENCES ON VIOLATING THE CODE OF CONDUCT

Violations of the Code of Conduct will result in disciplinary action, which may include one or more of the following consequences, depending on the severity and nature of the violation:

1. **Warning:** In cases of minor violations, individuals may receive a warning from their supervisor or manager or Human Resource. The warning will document the violation and remind the individual of their obligations under the Code of Conduct. This may be either a verbal warning or written warning.
2. **Suspension or Financial Penalty:** In cases of any moderate violation or failure to comply with earlier warning terms, individuals may be suspended for a specified period, demoted from their current role, or a financial penalty can be imposed. During the suspension, the individual will not be permitted to perform any work-related activities or access company facilities or resources.
3. **Termination of Employment or Contract:** In case of serious violations or individuals who continue to violate the Code of Conduct, despite previous warnings or disciplinary actions, may face termination of employment or their business contracts/agreements. Termination will be carried out in accordance with applicable employment laws and other relevant company policies.
4. **Legal Action:** In cases where violations of the Code of Conduct involve financial frauds, criminal behaviour or violations of the law, Smartworld reserves the right to take legal action against the individual(s) responsible. This may include reporting the matter to law enforcement authorities and pursuing civil or criminal remedies as appropriate.

The specific consequences for violations of the Code of Conduct will be determined on a case-by-case basis, considering factors such as the severity of the misconduct, the individual's disciplinary history, and any mitigating or aggravating circumstances. All disciplinary actions will be administered fairly, consistently, and in accordance with applicable laws and company policies. Basis the assessment of the violation the CoC committee will take the disciplinary actions.

The enforcement committee for implementing the Code of conduct policy shall be known as the CoC committee which consists of 3 (three) members as authorised and formulated with the due approval of the Board of Directors. The committee shall function independently and possess the power to bring changes in the Code of Conduct policy and take necessary actions. If any member resigns or becomes unavailable to fulfil their duties, the committee shall be restructured to maintain the minimum required number of members.

By clearly communicating the consequences of violations, we reinforce the importance of adhering to the Code of Conduct and promote a culture of high ethical standards, accountability, integrity, and respect within Smartworld.

UNACCEPTABLE CONDUCT

- **Discrimination and Harassment**

Discriminating against or harassing individuals based on race, creed, ethnicity, colour, caste, religion, gender, sexual orientation, age, disability, individual's job title, rank / role, or any other protected characteristic is strictly prohibited. This includes verbal, physical, behavioral or written harassment, as well as any form of unwanted or unwelcome behavior that creates a hostile or intimidating environment.

Our unwavering commitment lies in upholding the most stringent ethical standards, fostering equal treatment, embracing diversity, and promoting inclusivity.

- **Bullying and Intimidation**

Engaging in bullying, intimidation, or coercion of others is unacceptable. This includes behavior that undermines, belittles, or humiliates individuals, or creates a climate of fear, intimidation, or hostility.

- **Retaliation**

Retaliating against individuals who report violations of the Code of Conduct or participate in investigations of alleged misconduct is strictly prohibited. Retaliation can take various forms, including but not limited to threats, intimidation, or adverse employment actions.

- **Misuse of Authority or Influence**

Abusing positions of authority or influence for personal or improper gain or manipulate others is unacceptable. This includes using authority to pressuring subordinates / peers or coerce others into engaging in unethical or inappropriate conduct.

- **Conflict of Interest**

Failing to disclose or manage conflicts of interest that may compromise your ability to act in the best interests of Smartworld is prohibited. This includes situations where personal interests, financial interests or relationships etc. may conflict with your professional duties or obligations.

It includes but not limited to accepting bribes, kickbacks, gifts (whether in kind or cash), or Favors that could influence decision-making, using one's position for personal gain, including insider trading or unauthorized use of confidential information.

In case of any type of known or potential conflict, every individual must notify promptly within 48 hours of such incidents to the Ethics Officer in such form as annexed as "**Annexure B**" to this policy and act as per the instructions issued.

- **Breach of Employment Terms**

Failing to abide by the terms of the employment contract shall be considered as an act of violation of the Code. Violation of employment contract may be applicable but not limited to dual employment, working outside employment (with or without remuneration), failure to disclose relevant information, unauthorized disclosure of intellectual property, failure to maintain confidentiality, performance issues, non-compliance with the Gift policy (whether in kind or in cash) and attendance issues.

- **Misuse of Resources**

Misappropriating or misusing Smartworld resources, including funds, property, assets, equipment, data (physical or digital) or confidential information for personal gain or unauthorized purposes is prohibited.

- **Dishonesty and Fraud**

Engaging in dishonest or fraudulent behavior, whether on company premises or outside the organization, is strictly prohibited. This includes, but is not limited to, activities such as bribery, corruption, kickbacks, theft, embezzlement, forgery, and falsification of records.

- **Drugs and alcohol**

The Company strictly prohibits the use, possession, sale, purchase, or transfer of alcohol or controlled substances on its premises, except for medically prescribed drugs. Smoking is not allowed in the workplace. Drunkenness, intoxication, or disorderly conduct—whether on or off Company premises, if work-related—will be treated as misconduct and may lead to disciplinary action.

- **Violation of Policies and Statutory Laws**

We expect all individuals associated with the company to always act responsibly and in full compliance with legal requirements. Violation of any applicable organizational policies and Statutory laws/regulations is unacceptable.

- **Inappropriate Conduct**

Engaging in behavior or conduct that is disruptive, disrespectful, or otherwise inappropriate inside or outside the workplace is prohibited. This includes, but is not limited to, excessive use of profanity, disruptive behavior, failure to adhere to company policies and non-compliance of laws, as well as behavioral issues, malpractice, illicit conduct, and unethical conduct both within and outside the organization.

- **Insider trading**

Our stakeholders must not indulge in any form of insider trading nor assist others, including immediate family, friends or business associates, to derive any benefit from access to and possession of sensitive price information that is not in the public domain. Such information would include information about our Company, our group companies, our clients and our suppliers.

- **Misconduct Outside of Work**

Engaging in conduct outside of work (including unacceptable actions, misconduct, illicit behavior, actions of moral turpitude, societal values etc.) that reflect negatively on Smartworld or violates the principles and values outlined in this Code of Conduct is unacceptable and may be subject to disciplinary action.

RECEIVING OR GIVING GIFTS OR ANY BENEFITS

At Smartworld, we are committed to conducting our business with integrity, transparency, and fairness. Business gifts are occasionally used during business activity to build goodwill and strengthen working relationships among business associates, but we recognize that the exchange of gifts or benefits can potentially create conflicts of interest or compromise ethical standards. Therefore, this policy explains what is permitted and not permitted when you offer or accept gifts, travel, entertainment, or any other thing of value, including: -Norms and monetary limits for accepting and giving business gifts, circumstances under which it would be acceptable to receive or give business gifts, Exceptions to the Policy and Consequences of violation of the Policy.

What is a Gift?

The term 'gift' would include any gratuitous monetary or non-monetary benefit that can be used or consumed. A 'gift' is pretty much anything and everything that is given - either in kind, or as a physical gift including entertainment, travel or any other thing that carries value.

1. Acceptance of Gifts or Benefits

- a) Employees must avoid situations where the acceptance of gifts or benefits could influence, or be perceived to influence, their judgment or decision-making in any business matter.
- b) Gifts or benefits of nominal value (not exceeding **INR 5,000/- (Rupees Five Thousand only)**), such as promotional items or customary tokens of appreciation, are generally acceptable but with prior intimation to the company in Gift declaration form annexed as "**Annexure C**" to this policy.
- c) Any gifts, favours, entertainment, or benefits received by employees that exceed of INR 5000/- (Rupees Five Thousand only) or raise concerns must be reported to the President – Human Resources of the Company in the Gift declaration form and shall act in accordance with the instructions given by the President – Human Resources or the Ethics Officer.

2. Offering Gifts or Benefits

- a) Employees must not offer gifts, favors, entertainment, or other benefits to clients, suppliers, government officials, or any other parties with the intent to gain an unfair advantage or improperly influence business decisions.
- b) All gifts or benefits offered on behalf of the company must adhere to company policies and guidelines. Any exceptions must be approved by the appropriate authority.

3. Disclosure and Reporting

Employees must promptly declare the gifts so received of any value within 48 hours of receipt of the gift in the Gift declaration form annexed as "**Annexure C**" to this policy. Such declaration shall be submitted via email on gifts@smartworlddevelopers.com

4. Conflicts of Interest

Employees must avoid conflicts of interest that may arise from giving or receiving gifts, favors, entertainment, or other benefits. Any actual or perceived conflicts of interest must be disclosed in the Conflict-of-Interest declaration form annexed as "**Annexure B**" to this policy. Such declaration shall be submitted to the President - Human Resource and/or Ethics officer of the Company.

5. Consequences of Violation

Violations of this policy may result in disciplinary action, up to and including termination of employment, depending on the severity of the breach and in accordance with company policies and procedures.

UNDERTAKING & INDEPENDENT DECLARATION

Every employee is required to submit an Undertaking and Independent Declaration at the time of joining Smartworld disclosing the information which may constitute Conflict of Interest situation. The Declaration forms are annexed as "**Annexure A**" to this policy

- a) This declaration must be reaffirmed annually as a part of the Annual Declaration exercise which needs to be submitted to the HR department within the agreed timelines
- b) Additionally, in case of any change in the earlier submission made by the employee, such a change shall be reported within 48 hours on becoming aware of any such conflict with the HR department. Failing to do so may result in potential disciplinary actions by the committee at a later stage.
- c) The HR Department, on becoming aware of such conflict shall discuss such conflict with the CoC committee/Ethics officer for the next steps.

REPORTING PROCEDURES

If you become aware of or witness a violation of the Code of Conduct, we encourage you to report it promptly using one of the following channels:

i. Whistleblower Reporting System

Smartworld maintains a Vigil reporting system for reporting the concerns about violations of the Code of Conduct. This allows individuals to report misconduct confidentially without fear of retaliation. Employees can raise complaints either through an email on sw.whistleblower@smartworlddevelopers.com or through written letters be addressed to Ombudsperson in the manner as more particularly mentioned in the Whistleblower policy.

Further, Complaints can also be raised using Whistleblower reporting tool accessible at:

<https://whistleblower.smartworlddevelopers.com/>



It may be noted that Ombudsperson shall forward the complaint to the **Steering committee**. The Steering Committee is responsible for reviewing, investigating, and resolving all Whistleblower complaints in a fair and objective manner. All reported concerns will be investigated in a timely manner and resolved within **90 days** from the date of receipt, unless an extension is justified and documented.

ii. Direct Supervisor or Manager

If you don't feel comfortable in reporting the complaint directly, then you can report the violation to your Direct Supervisor or Manager / HOD. However, the Supervisor or Manager / HOD is liable to report the same on Whistleblowing platform and needs to ensure the confidentiality of the matter.

iii. COC Committee / Ethics Officer

You can report violations to the COC Committee or Ethics officer. The designated officer must handle sensitive matters confidentially and can provide guidance on how to proceed with your reporting on the Whistleblowing platform. You can reach out to the Ethics officer either in person, or via email.

When reporting a violation of the Code of Conduct, please provide as much detail as possible, including specific incidents, dates, times, and individuals involved. Your report will be handled confidentially and with the utmost discretion, and retaliation against individuals who report violations in good faith is strictly prohibited.

All reports of Code of Conduct violations will be promptly, and thoroughly investigated, and appropriate disciplinary action will be taken as necessary. Smartworld is committed to maintaining a culture of integrity, accountability, and transparency, and your cooperation in reporting misconduct is essential in upholding these values.

Note – 1. All the matters related to the POSH (Prevention of Sexual Harassment) shall be routed to POSH committee by mailing your complaints and grievances on posh@smartworlddevelopers.com. Further complaints of a routine nature should not be reported here and be addressed to the Human Resources department only.

CONFIDENTIALITY

While every effort will be made to maintain confidentiality, there may be limited circumstances where disclosure of information is necessary, including:

- To comply with legal or regulatory requirements.
- To prevent imminent harm to individuals or the organization.
- When required for the purpose of investigating or taking appropriate disciplinary action.

In such cases, only the minimum amount of information necessary will be disclosed, and efforts will be made to protect the privacy and confidentiality of individuals involved to the extent possible.

CONFIDENTIALITY ASSURANCE

All individuals involved in the reporting and investigation process are expected to respect the confidentiality of the information they receive and handle it with care. Breaches of confidentiality may result in disciplinary action, up to and including termination of employment or contract.

By ensuring the confidentiality of the Code of Conduct reporting process, we uphold the trust and integrity of our organization and demonstrate our commitment to a safe, respectful, and ethical workplace environment.

NON-RETALIATION

Smartworld prohibits retaliation against individuals who report violations of the Code of Conduct in good faith. Any form of retaliation against reporters, witnesses, or individuals involved in the investigation process will be treated as a separate violation and subject to disciplinary action. However, in case of any complaint of frivolous nature or complaints made with Mala fide intentions to obtain undue personal gains shall be rejected by the committee and be subject to Committee's action.

TRAINING AND AWARENESS

Smartworld will provide regular training and awareness initiatives to ensure that all individuals associated with the organization understand their obligations under the Code of Conduct and are aware of the reporting procedures and consequences of violations.

By enforcing the Code of Conduct consistently and transparently, we demonstrate our commitment to maintaining a culture of integrity, respect, and accountability.

CONTACT INFORMATION

If you have questions, concerns, or wish to report a violation of the Code of Conduct, please contact:

Human Resources Department

President Human Resource: Mr. Vikas Malhotra

Email: vikas.malhotra@smartworlddevelopers.com

Whistleblower Reporting System

Email - Sw.whistleblower@smartworlddevelopers.com

URL - <https://whistleblower.smartworlddevelopers.com/>

Code of Conduct Committee/Steering Committee

Name	Designation
Mr. Amit Sharma	Ethics officer
Mr. Vikas Malhotra	President (Head) – Human Resources
Mr. Sayantan Mondal	AVP (Head) – Legal

Ethics officer/Ombudsperson

Email: amit.sharma@smartworlddevelopers.com

ANNEXURE - A

EMPLOYEE UNDERTAKING AND INDEPENDENT DECLARATION FORM

I understand and acknowledge that this undertaking/declaration forms an integral part of my Employment Agreement with Smartworld Developers Private Limited and/or group companies, associates, affiliates or subsidiaries ("hereinafter referred to as **Company or Smartworld**") and shall at all times (during my entire tenure with Smartworld) be read in conjunction with it in order to prevent giving rise to any potential/actual/perceived situation of Conflict of Interest.

I further understand that I am required to complete this form in full and truthful manner and any wrongful or dishonest disclosure of information in this form, whether intentional or not, may lead to various disciplinary actions against me including but not limited to immediate termination of my employment with the Company and may also be considered as a violation of the Company's Code of Conduct and other applicable policies.

A	Personal Details:
	Name ("I"):
	Date of Birth:
	Address:
	Phone Number:
	Department:
	PAN:
B	Undertaking:
<input type="checkbox"/>	<p>I confirm that neither I nor any of my Relatives hold a position of interest in any firm, association, partnership, corporation or other business organization, including any subsidiary or related company thereof, that has entered into any contract or agreement with the Company including the contracts or agreements that stand expired or terminated at the time of making this Declaration. Except as mentioned below:</p> <p>_____</p>
<input type="checkbox"/>	<p>I confirm that neither I nor any of my Relatives possess any direct or indirect personal or professional relationship with any principal officer, employee or director of any firm, association, partnership, corporation, or other business organization, including any subsidiary or related company thereof that has entered into any business transaction or agreement with the Company in past or present. Except as mentioned below:</p> <p>_____</p>

<input type="checkbox"/>	I confirm that in consideration of my employment / engagement with Smartworld, I may / shall be subject to various checks, inspections, assessments, verifications, inquiry, investigation including but not limited to screening of any past records, financial transactions (if found suspicious) of self and relatives by the company in its absolute discretion and I shall have no objection whatsoever to any such act, deed or thing on the part of the Company and/or its representatives. Further, I shall not raise any protest, concern and/or dispute such action on the part of the Company and/or its representatives.
<input type="checkbox"/>	I confirm that I shall not influence or participate in the appointment of any Contractors, Vendors, Channel Partners, DSAs, employees, or similar parties, nor shall I engage in any performance reviews of the parties for personal gain. This shall not apply to instances where such involvement is necessary to fulfill the duties or obligations assigned to me as part of my role or responsibilities.
<input type="checkbox"/>	I confirm that I shall not accept gifts, entertainment, or other benefits from any individual or organization who are doing business with the Company or which may influence my conduct, more than the value as defined in the Code of conduct policy of the Company.
<input type="checkbox"/>	I will always maintain the highest standard of professionalism in my conduct and behaviour, avoiding actions that might bring disrepute to the Company or may have financial impact on the Company. Further, if I come across any such unethical actions or breach of Company's Code of conduct policy, I shall inform Whistleblower committee / Code of Conduct committee.
<input type="checkbox"/>	I confirm that I am not engaged with the Company in any other capacity including but not limited to vendors, DSA, Brokers or Channel Partners other than that of my employment with the Company. Except as mentioned below, _____
<input type="checkbox"/>	I confirm that I will, at all times/ during my entire tenure with the company adhere to the Company's prevailing rules, policies, protocols, code of conduct that may be amended from time to time.
<input type="checkbox"/>	I shall not commence or engage in any business that may lead to a conflict of interest with the Company's business/affairs and shall not be part of any financial transaction with the competitor, vendor, supplier, customer or channel partner of the company etc.
<input type="checkbox"/>	I confirm that at the time of making this declaration, I am not presently employed/self-employed or have accepted an offer for employment with any other organization whether part-time or full-time on a temporary/permanent basis. Except as mentioned below: _____
<input type="checkbox"/>	I, hereby declare that as a working professional, I am registered with _____ (Institute/Council/Department), and I hold a Certificate of Practice/Registration Certificate bearing number _____ which is valid till _____ and shall not be used for the any other purpose than authorized by the company.
<input type="checkbox"/>	I confirm that, in my capacity as an Employee, I possess certain proprietary / confidential information and shall comply with Smartworld's code of conduct and data integrity policy. This

	information includes, but is not limited to the following: files, data, drawings, records, protocols, reports, interviews, surveys, schedules, etc. Confidential information may be oral, written, or electronic.
<input type="checkbox"/>	I confirm that even after the termination of my employment with the Company, I will continue to uphold confidentiality, refrain from using proprietary information for personal gain, and avoid activities that may conflict with the interests of the Company or violation of any laws, regulations etc.
<input type="checkbox"/>	I hereby confirm that I shall always protect and safeguard all the data (both digital and physical) entrusted to me by the Company. I further agree to return all the data in good condition upon my departure from the Company. Additionally, I shall not misuse the Company's property for any unethical, unlawful, or illegal activities at any time during my tenure.
<input type="checkbox"/>	I confirm that, at all the times during the term of my employment with the Smartworld in the future, I shall intimate the Company (formally in writing to my Department Head, Risk Management Head and HR Head). regarding any change in my submission and further shall keep the Company informed in case of any breach of my obligations or any event that may give rise to a conflict-of-interest situation.
<input type="checkbox"/>	<p>I solemnly declare that I have not been convicted in any criminal/civil case in India and abroad, nor any civil or criminal case is pending in any Court of Law against me. Except as mentioned below,</p> <hr/> <p>(Please give particulars like nature of proceedings, Case No./Title, details of Investigating agency, any other details etc.)</p>
<input type="checkbox"/>	I shall ensure confidentiality of this document and its contents and shall not disclose the same to any third party.
<input type="checkbox"/>	I confirm that during the course of my employment with Smartworld if I become convicted of any offence and/or charged with any actions or breach of any of the above declarations or the policies of Smartworld and/or If I am otherwise found to be engaged in any act, deed or thing which in the opinion of the Company is detrimental to the Company, in that case the Company has all the rights to take disciplinary action against me including but not limited to termination of any employment. In such an event, the notice period as mentioned in my employment contract shall stand waived by the Company, in its sole discretion.
<input type="checkbox"/>	I confirm that this form is being executed and signed by me of my own free will without any force or coercion or undue influence and I fully understood the contents mentioned in this form. I further confirm that this form shall survive the suspension/termination of my services/employment with the Company.

Employee Signature:

Employee Name:

Date:

Location:

ANNEXURE – B

Conflict of Interest Declaration form (Other than Employees)

Field	Details
Name and contact details of the Discloser	
Category of Discloser (viz Vendor, Customer, etc.)	
Organization Name (if any)	
Date of Declaration	
Nature of Conflict	
Details of the Conflict	
Potential Impact	
Effectuated Organizations	

Note - During evaluation, the Ethics officer may ask for additional information as may be required.

I/We hereby acknowledge that I/We have read and understood the contents of this Conflict-of-Interest Declaration form. I/We confirm that the information provided is accurate to the best of my knowledge and that I/We am/are fully aware of my responsibility to disclose any potential conflicts of interest in accordance with the company's policies and procedures. I/We understand that failure to disclose or provide incorrect information may result in disciplinary action as per the company's regulations.

By signing this form, I/We consent to the processing of the information provided for the purpose of managing and addressing conflicts of interest within the organization.

Signature:

Date:

Location:

ANNEXURE – C

Gift Declaration form

Please complete the form below if you are receiving the gift.
Depending on the value and nature of the gift, approval from the CoC committee / Ethics Officer may be required.
Any gift up to the value of Rs. 5,000/- (Rupees Five Thousand only) shall be considered of Nominal Value

Questions	Answer field
1. Your Name	
2. Your official email address	
3. Your department details	
4. Your reporting manager's details including name, contact details etc.	
5. Whether the gift has been received or not?	
6. If #5 yes, then date of receipt	
7. Estimated value of the gift (In INR)	
8. Please describe the gift (Dinner, entertainment, bottle of wine, any other item etc.)	
9. Gift offered / given by	
10. Category of the gift giver (Customer, Vendor, Channel Partner etc.)	
11. Gift giver organisation details (if any)	
12. Please provide details/occasion as to why they have presented you with this gift?	
13. Are you aware of any outstanding business renewals, deals or any other conflicts of interest with this person or their organisation at the time of receiving the gifts?	

Note - During evaluation, the Ethics officer may ask for additional information as may be required.

I hereby acknowledge that I have read and understood the contents of this Declaration form. I hereby confirm that the information provided is accurate to the best of my knowledge and that I am fully aware of my responsibility to disclose the Gift receiving in accordance with the company's policies and procedures. I understand that failure to disclose and providing incorrect information may result in disciplinary action as per the company's regulations.

Signature:

Date:

Location: