



CODE OF CONDUCT

Latest Update: 29 December, 2021

The *Conneqtion Group's Code of Conduct* supports the Global Business Ethics Policy and provides an overview of some of the legal and ethical standards we are each expected to follow every day. If you are unsure of what to do in a situation, you have support. Speak with your manager, Partner Resources or Business Ethics and Compliance about your concerns. Please read the Standards carefully at work.

Applicability of the Code

We expect all of our employees and Board members to know and follow the Code. Failure to do so can result in disciplinary action, including termination of employment. Moreover, while the Code is specifically written for *Conneqtion Group's* employees and Board members, we expect members of our extended workforce (vendors, and independent contractors) and others who may be temporarily assigned to perform work or services to follow the Code in connection with their work for us. Failure of a member of our extended workforce or other covered service provider to follow the Code can result in termination of their relationship with Conneqtion Group.

Asking for Guidance and Voicing Concerns

Conneqtion Group core values require compliance with the law, as well as ethical conduct. If you feel these standards have not been met, need access to policies, or have any questions, please ask for guidance or voice your concerns by contacting any of the following resources namely your manager, your Human Resources representative or Ethics & Compliance.

Anti-Retaliation Policy

Conneqtion Group does not tolerate retaliation against or the victimization of any partner/client who raises concerns or questions regarding a potential violation of the Standards of Business Conduct or any Conneqtion Group policy that he or she reasonably believes to have occurred.

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1. Privacy and Security

There are strict rules relating to the processing and handling of private and secret information.

The Employees or clients or partners will manage information in such a way that supports the needs of the business while ensuring efficiency, security and compliance with any legal or regulatory requirements. This policy applies to records maintained in all forms at Conneqtion Group, including paper and electronic.

There are strict rules relating to the processing and handling of private and secret information. This includes collecting, storing, using, amending, disclosing and destroying information.

- Records must always be prepared accurately and reliably, and stored properly;
- Records must accurately and fairly reflect, within normal accounting and reporting systems, all required transactions and other events.
- There cannot be any unrecorded company funds, assets or any other type of “off the books” accounts, no matter what the reason for such accounts.

You must not knowingly destroy or discard information that is subject to a legal hold. Records relevant to a legal action cannot be destroyed or discarded and must be preserved. If Conneqtion Group receives any form of legal order, a request for records or other legal papers, or if we have reason to believe that such a request or demand is likely, the company policy is to retain all information that is relevant to the matter.

2. Integrity

Our reputation as a company that our users can trust is our most valuable asset, and it is up to all of us to make sure that we continually earn that trust. All of our communications and other interactions with our users should increase their trust in us.

3. Our practice

Consistent with the Principles, the people connected with Conneqtion are expected to do their utmost to create a supportive work environment, where everyone has the opportunity to reach

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their fullest potential, and be free from harassment, intimidation, bias, and unlawful discrimination.

- **Equal Employment Opportunities**

Consistent with the Constitution of India and Global Human Rights Standards, Connection Group promotes equal opportunity in its hiring practices, makes recruiting decisions based solely on job-related criteria and does not use forced labor. We treat each other with respect and dignity. This means that all partners are entitled to work in an environment that is free of harassment, bullying and discrimination.

Harassment, bullying and discrimination take many forms, including but not limited to:

1. Unwelcome remarks, gestures or physical contact,
2. The display or circulation of offensive, derogatory or sexually explicit pictures or other materials, including by email and on the Internet,
3. Offensive or derogatory jokes or comments (explicit or by innuendo),
4. Verbal or physical abuse or threats, etc.

- **Drugs and Alcohol**

You also must not use or possess illegal drugs or controlled substances on Connection Group's property or while you are engaged in any job-related activity. Employees or freelancers may not report to work under the influence of alcohol, illegal drugs or controlled substances.

- **Safe and Healthy Workplace**

We are committed to a safe, healthy, and violence-free work environment. Behavior that poses risk to the safety, health, or security of our extended workforce, or visitors is prohibited. If you become aware of a risk to the safety, health, or security of our workplace, you should report it to Connection Groups immediately. If it is life-threatening or an emergency, call your local police, fire, or other emergency responders first, and then report it to the Management.

4. Personal Investments

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Avoid making personal investments in companies that are competitors or business partners when the investment might cause, or appear to cause, you to act in a way that could harm Conneqtion Group.

When determining whether a personal investment creates a conflict of interest, consider the relationship between the business of the outside company, Conneqtion Group's business, and what you do at Conneqtion Group, including whether the company has a business relationship with Conneqtion Group that you can influence, and the extent to which the company competes with Conneqtion Group. You should also consider:

- any overlap between your specific role at Conneqtion Group and the other company's business,
- the significance of the investment, including the size of the investment in relation to your net worth,
- whether the investment is in a public or private company,
- your ownership percentage of the company, and
- the extent to which the investment gives you the ability to manage and control the company.

Investments in venture capital or other similar funds that invest in a broad cross-section of companies that may include Conneqtion Group's competitors or business partners generally do not create conflicts of interest. However, a conflict of interest may exist if you control the fund's investment activity.

5. Competitors or Former Employers

We respect our competitors and want to compete with them fairly. But we don't want their confidential information. The same goes for confidential information belonging to any former employers of Conneqtion Group. If an opportunity arises to take advantage of a competitor's or former employer's confidential information, don't do it. Should you happen to come into possession of a competitor's confidential information, contact Legal immediately.

Fair competition laws are intended to promote vigorous competition in a free market. It is in Conneqtion Group's best interest to promote free and open competition. Conneqtion Group

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must make its own business decisions, free from understandings or agreements with competitors or suppliers that restrict competition. We consider compliance with these laws of vital importance.

When conducting Conneqtion Group business, all partners must:

- Not discuss pricing, production or markets with competitors
- Not set resale prices with customers or suppliers
- Always present Conneqtion Group services and products in a manner consistent with our core values
- Not induce a third party to breach an existing agreement
- Never act in a manner that could be seen as an attempt to exclude present or potential competitors or to control market prices

6. Gifts and Entertainment

A gift or favor should not be accepted or given if it might create a sense of obligation, compromise your professional judgment or create the appearance of doing so. In deciding whether a gift is appropriate, you should consider its value and whether public disclosure of the gift would embarrass you (employees or freelancers) or Conneqtion Group.

7. Anti-bribery Laws

Like all businesses, Conneqtion Group is subject to Indian Law i.e. Prevention of Corruption Act, 1988 that prohibits bribery in virtually every kind of commercial setting. The rule for us at Conneqtion Group is simple – don't bribe anybody, anytime, for any reason.

8. Interaction with the Government

Conneqtion Group is committed to complying with local laws, regulations and codes and to working fairly and honestly with government officials and others in our communities. In doing so, our actions must meet high ethical and legal standards. It is against Conneqtion Group policy (and may be a breach of law) to offer or make a payment or gift of any kind in order to facilitate a local process or to influence a local government official.

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9. Conclusion

Conneqtion Group aspires to be a different kind of company. It's impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another's good judgment to uphold a high standard of integrity for ourselves and our company. We expect all people directly or indirectly involved in the internal matters of the Company to be guided by both the letter and the spirit of this Code. Sometimes, identifying the right thing to do isn't an easy call. If you aren't sure, don't be afraid to ask questions of your manager, Legal or Ethics & Compliance.

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Director

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