

EMPLOYEE CODE OF CONDUCT POLICY

Objective

Esycommerce Digital Services LLP (hereinafter referred to as “EsyCommerce”) recognizes the need to establish a Code of Conduct policy for its employees and associates in order to define the way business relationships, official dealings, social behaviour and comradery need to be maintained within and outside of office premises..

Scope and Applicability

This policy covers all employees across levels and hierarchy in the organization.

All employees:

1. Permanent
2. Part-time
3. Contract
4. Temporary

Also the employees of :

1. Partners
2. Vendors

Policy/Process

4.1. National Interest

EsyCommerce shall be committed in all its actions to benefit the economic development of our country and shall not engage in any activity that would adversely affect such objective. It shall not undertake any project or activity to the detriment of the Nation's interests or those that will have any adverse impact on the social and cultural life patterns of its citizens. EsyCommerce shall conduct its business affairs in accordance with the economic development and foreign policies, objectives and priorities of the National or



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Local government and shall strive to make a positive contribution to the achievement of such goals at the international, national and regional level as appropriate.

4.2. Financial Reporting and Records

EsyCommerce shall prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of our country.

Internal accounting and audit procedures shall fairly and accurately reflect all of the Company's business transactions and disposition of assets. All required information shall be accessible to company auditors and other authorized parties and government agencies. There shall be no willful omissions of any company transactions from the books and records, no advance income recognition and no hidden bank account and funds.

Any willful material misrepresentation of and/or misinformation on the financial accounts and reports shall be regarded as a violation of the Company's Code of Conduct policy, leading to inviting appropriate civil or criminal action under the relevant laws.

4.3. Competition

EsyCommerce shall fully strive for the establishment and support of a competitive open market economy in India and abroad and shall cooperate in the efforts to promote the progressive and judicious liberalization of trade and investment by those countries.

Specifically, EsyCommerce shall not engage in activities which generate or support the formation of monopolies, cartels and similar unfair trade practices.

EsyCommerce shall market its products and services on its own merits and shall not make unfair and misleading statements about competitors' products and services. Any collection of competitive information shall be made only in the normal course of business and shall be obtained only through legally permitted sources and means.



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4.4. Gifts and Donations

EsyCommerce and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits which are intended to or perceived to obtain business or uncompetitive favors for the conduct of its business. However, EsyCommerce and its employees may accept and offer nominal non-cash gifts, the value of which shall not exceed Rs. <XXX> per annum, which are customarily given and are of commemorative nature for special events.

4.5. Government Agencies

EsyCommerce and its employees shall not offer or give any company funds or property as donation to any government agencies or their representatives, directly or through intermediaries, in order to obtain any favorable performance of official duties.

4.6. Political Non-alignment

EsyCommerce shall be committed to and support a functioning democratic constitution and system with a transparent and fair electoral system in India. EsyCommerce shall not support directly or indirectly any specific political party or candidate for political office. The Company shall not offer or give any company funds or property as donations, directly or indirectly, to any specific political party, candidate or campaign.

4.7. Health, Safety and Environment

EsyCommerce shall strive to provide a safe and healthy working environment and comply, in the conduct of its business affairs, with all regulations regarding the preservation of the environment of the territory it operates in.

4.8. Quality of Products and Services

EsyCommerce shall be committed to deliver services of the highest quality standards backed by efficient customer relationship management consistent with the requirements of the customers to ensure their total satisfaction.



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4.9. Corporate Citizenship

EsyCommerce shall be committed to be a good corporate citizen not only in compliance with all relevant laws and regulations but also by actively assisting in the improvement of the quality of life of the people in the communities in which it operates.

4.10. Public Representation of the Company

EsyCommerce honors the information requirements of the public and its stakeholders. In all its public appearance with respect to disclosing company and business information to public constituencies such as the media, the financial community, employees and shareholders, only specifically authorized director/s and employees shall represent EsyCommerce. It will be the sole responsibility of these authorized representatives to disclose information of the Company.

4.11. Corporate Policies

EsyCommerce shall recommend to its Board of Directors the adoption of policies and guidelines periodically formulated.

4.12. Shareholders

EsyCommerce shall be committed to enhance shareholder value and comply with all regulations and laws that govern shareholders' rights. The Board of Directors of EsyCommerce shall duly and fairly inform its shareholders about all relevant aspects of the Company's business and disclose such information in accordance with the respective regulations and agreements.

4.13. Ethical Conduct

Every employee of EsyCommerce, which shall include head of the company, shall deal on behalf of the Company with professionalism, honesty, integrity as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be as such by third parties.

Every employee shall be responsible for the implementation of and compliance with the Code in his professional environment. Failure to adhere to the Code of conduct could attract the most severe consequences including termination of employment.

4.14. Regulatory Compliance

Every employee of EsyCommerce, shall in his business conduct, comply with all applicable laws and regulations, both in letter and in spirit, in all the territories in which it operates. If the ethical and professional standards set out in the applicable laws and regulations are below that of the Code, then the standards of the Code shall prevail.

4.15. Concurrent Employment

An employee of EsyCommerce shall not, without the prior approval of the head of the company, accept employment or a position of responsibility (such as a consultant or a director) with any other company, nor provide "free-lance" services to anyone. In the case of the head of the company such prior approval must be obtained from the Board of Directors of the company.

4.16. Conflict of Interest

An employee of EsyCommerce shall not engage in any business, relationship or activity, which might detrimentally conflict with the interest of EsyCommerce. A conflict of interest, actual or potential, may arise where directly or indirectly: (a) an employee of EsyCommerce engages in a business relationship or activity with anyone who is party to a transaction with his Company, (b) an employee is in a position to derive a personal benefit or a benefit to any of his relatives by making or influencing decisions relating to any transaction, and (c) an independent judgment of the Company's best interest cannot be exercised.

The main areas of such actual or potential conflicts of interest would include the following

- Financial interest of an employee of EsyCommerce or his relatives including the holding of an investment in the subscribed share capital of any company or a share in any firm which is an actual or potential competitor, supplier, customer, distributor, joint venture or other alliance partner of the EsyCommerce.

- An employee of EsyCommerce conducting business on behalf of the Company or being in a position to influence a decision with regard to Company's business with a supplier or customer of which his relative is a principal, officer or representative, resulting in a benefit to him or his relative.
- Award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative of an employee of EsyCommerce where such an individual is in a position to influence the decision with regard to such benefits.
- Acceptance of gifts, donations, hospitality and/or entertainment beyond the customary level from existing or potential suppliers, customers or other third parties which have business dealings with the Company.

Notwithstanding that such or other instances of conflict of interest exist due to any historical reasons, adequate and full disclosure by the interested employees should be made to the company's management. It is also incumbent upon every employee to make a full disclosure of any interest which the employee or the employee's immediate family, which would include parents, spouse and children, may have in a company or firm which is a supplier, customer, distributor of or has other business dealings with his Company.

Every employee who is required to make a disclosure as mentioned above shall do so, in writing, to his immediate superior who shall forward the information along with his comments to the person designated for this purpose by the head of the company who in turn will place it before the head of the company and/or the Board of Directors and upon a decision being taken in the matter, the employee concerned will be required to take necessary action as advised to resolve / avoid the conflict.

If an employee fails to make a disclosure as required herein and the management of its own accord becomes aware of an instance of conflict of interest that ought to have been disclosed by the employee, the management would take a serious view of the matter and consider suitable disciplinary action against the employee, including termination of employment and recovery of any damages.

4.17. Securities Transactions and Confidential Information

An employee of EsyCommerce and his immediate family shall not derive any benefit or assist others to derive any benefit from the access to and possession of information about the Company, which is not in the public domain and thus constitutes insider information.



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An employee of EsyCommerce shall not use or proliferate information which is not available to the investing public and which therefore constitutes insider information for making or giving advice on investment decisions on the securities of EsyCommerce on which such insider information has been obtained.

Such insider information might include the following

- ⊄ Acquisition and divestiture of businesses or business units.
- ⊄ Financial information such as profits, earnings and dividends.
- ⊄ Announcement of new product introductions or developments.
- ⊄ Asset evaluations.
- ⊄ Investment decisions/plan
- ⊄ Restructuring plans
- ⊄ Major supply and delivery agreement
- ⊄ Raising finances.

4.18. Confidentiality on Salary and Compensation

Employees of EsyCommerce shall not disclose their compensation package to anyone nor shall be permitted to discuss the compensation of any other employees to others.

Failure to adhere to the Code could attract the most severe consequences including termination of employment.

4.19. Protecting Company Assets

The assets of EsyCommerce should not be misused but employed for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as systems, facilities, materials, and resources as well as intangible assets such as proprietary information, relationships with customers and suppliers, etc.

4.20. Citizenship

An employee of EsyCommerce shall in his private life be free to pursue an active role in civic or political affairs as long as it does not adversely affect the business or interests of the Company or the Group.



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4.21. Integrity of Data Furnished

Every employee of EsyCommerce shall ensure at all times, the integrity of data or information furnished by him to the Company.

Furnishing wrong information could attract the most severe consequences including termination of employment.

4.22. Reporting Concerns

Every employee of EsyCommerce shall promptly report to the management any actual or possible violation of the Code or an event he becomes aware of that could affect the business or reputation of EsyCommerce.

Employee relationships

We want to ensure that relationships between employees are appropriate and harmonious. We outline our guidelines and we ask you to always behave professionally.

Fraternization

Fraternization refers to dating or being friends with your colleagues. In this policy, “dating” equals consensual romantic relationships and sexual relations. Non-consensual relationships constitute sexual violence and we prohibit them explicitly.

Dating colleagues

If you start dating a colleague, we expect you to maintain professionalism and keep personal discussions outside of our workplace.

You are also obliged to respect your colleagues who date each other. We won't tolerate sexual jokes, malicious gossip and improper comments. If you witness this kind of behavior, please report it to HR.

Dating managers

To avoid accusations of favoritism, abuse of authority and sexual harassment, supervisors must not date their direct reports. This restriction extends to every manager above an employee.



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Also, if you act as a hiring manager, you aren't allowed to hire your partner to your team. You can refer them for employment to other teams or departments where you don't have any managerial or hiring authority.

Friendships at work

Employees who work together may naturally form friendships either in or outside of the workplace. We encourage this relationship between peers, as it can help you communicate and collaborate. But, we expect you to focus on your work and keep personal disputes outside of our workplace.

Employment of relatives

Everyone in our company should be hired, recognized or promoted because of their skills, character and work ethic. We would not like to see phenomena of nepotism, favoritism or conflicts of interest, so we will place some restrictions on hiring employees' relatives.

To our company, a "relative" is someone who is related by blood or marriage within the third degree to an employee. This includes: parents, grandparents, in-laws, spouses or domestic partners, children, grandchildren, siblings, uncles, aunts, nieces, nephews, step-parents, step-children and adopted children.

As an employee, you can refer your relatives to work with our company. Here are our only restrictions:

- ⊄ *[You must not be involved in a supervisory/reporting relationship with a relative.]*
- ⊄ *[You cannot be transferred, promoted or hired inside a reporting relationship with a relative.]*
- ⊄ *[You cannot be part of a hiring committee, when your relative is interviewed for that position.]*

If you become related to a manager or direct report after you both become employed by our company, we may have to *[transfer one of you.]*



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Workplace visitors

If you want to invite a visitor to our offices, please ask for permission from our [*HR Manager/ Security Officer/ Office Manager*] first. Also, inform our [*reception/ gate/ front-office*] of your visitor's arrival. Visitors should sign in and show identification. They will receive passes and will be asked to return them to [*reception/ gate/ front-office*] once their visit is complete.

When you have office visitors, you also have responsibilities. You should:

- ⊄ Always tend to your visitors (especially when they are underage.)
- ⊄ Keep your visitors away from areas where there are dangerous machines, chemicals, confidential records or sensitive equipment.
- ⊄ Prevent your visitors from proselytizing your colleagues, gathering donations or requesting participation in activities while on our premises.

Anyone who delivers orders, mail or packages for employees should remain at our building's reception or gate. If you are expecting a delivery, [*front office employees/ security guards*] will notify you so you may collect it.

Solicitation and distribution

Solicitation is any form of requesting money, support or participation for products, groups, organizations or causes which are unrelated to our company (e.g. religious proselytism, asking for petition signatures.) Distribution means disseminating literature or material for commercial or political purposes.

We don't allow solicitation and distribution by non-employees in our workplace. As an employee, you may solicit from your colleagues only when you want to:

- ⊄ Ask colleagues to help organize events for another employee (e.g. adoption/birth of a child, promotion, retiring.)
- ⊄ Seek support for a cause, charity or fundraising event sponsored, funded, organized or authorized by our company.
- ⊄ Invite colleagues to employee activities for an authorized non-business purpose (e.g. recreation, volunteering.)
- ⊄ Ask colleagues to participate in employment-related activities or groups protected by law (e.g. trade unions.)



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In all cases, we ask that you do not disturb or distract colleagues from their work.

Dress code

Our company's official dress code is [*Business/ Business Casual/ Smart Casual/ Casual.*] This includes [*slacks/ loafers/ blouses/ boots.*] However, an employee's position may also inform how they should dress. If you frequently meet with clients or prospects, please conform to a more formal dress code. We expect you to be clean when coming to work and avoid wearing clothes that are unprofessional (e.g. workout clothes, shorts, sportswear etc.)

As long as you conform with our guidelines above, we don't have specific expectations about what types of clothes or accessories you should wear.

We also respect and permit grooming styles, clothing and accessories that are dictated by religious beliefs, ethnicity or disability.

Cyber security and digital devices

This section deals with all things digital at work. We want to set some guidelines for using computers, phones, our internet connection and social media to ensure security and protect our assets.

Internet usage

Our corporate internet connection is primarily for business. But, you can occasionally use our connection for personal purposes as long as they don't interfere with your job responsibilities. Also, we expect you to temporarily halt personal activities that slow down our internet connection (e.g. uploading photos) if you're asked to.

You must not use our internet connection to:

- ⌘ Download or upload obscene, offensive or illegal material.
- ⌘ Send confidential information to unauthorized recipients.
- ⌘ Invade another person's privacy and gain access to sensitive information.
- ⌘ Download or upload pirated movies, music, material or software.
- ⌘ Visit potentially dangerous websites that can compromise our network and computers' safety.



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- ⌘ Perform unauthorized or illegal actions, like hacking, fraud or buying/selling illegal goods.

Cell phone

We may allow use of cell phones at work. But, we also want to ensure that your devices won't distract you from your work or disrupt our workplace. We ask you to follow a few simple rules:

- ⌘ Use your cell phone in a manner that benefits your work (business calls, productivity apps, calendars.)
- ⌘ Keep personal calls brief and use an empty meeting room or common area so as not to disturb your colleagues.
- ⌘ Avoid playing games on your phone or texting excessively.
- ⌘ Do not use your phone for any reason while driving a company vehicle.
- ⌘ Do not use your phone to record confidential information.
- ⌘ Do not download or upload inappropriate, illegal or obscene material using our corporate internet connection.

Also, you must not use your phone in areas where cell phone use is explicitly prohibited (e.g. laboratories.)

Corporate email

Email is essential to our work. You should use your company email only for work.

- ⌘ **Work-related use.** You can use your corporate email for work-related purposes without limitations. For example, you can sign up for newsletters and online services that will help you in your job or professional growth.

Our general expectations

No matter how you use your corporate email, we expect you to avoid:

- ⌘ Signing up for illegal, unreliable, disreputable or suspect websites and services.
- ⌘ Sending unauthorized marketing content or emails.
- ⌘ Registering for a competitor's services, unless authorized.
- ⌘ Sending insulting or discriminatory messages and content.



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- ✘ Spamming other people's emails, including your coworkers.

In general, use strong passwords and be vigilant in catching emails that carry malware or phishing attempts. If you are not sure that an email you received is safe, ask our HR or IT teams.

Social media

We want to provide practical advice to prevent careless use of social media in our workplace. We address two types of social media uses: using personal social media at work and representing our company through social media.

Using personal social media at work

You are permitted to access your personal accounts at work. But, we expect you to act responsibly, according to our policies and ensure that you stay productive. Specifically, we ask you to:

- ✘ **Discipline yourself.** Avoid getting sidetracked by your social platforms.
- ✘ **Ensure others know that your personal account or statements don't represent our company.** For example, use a disclaimer such as "opinions are my own."
- ✘ **Do not share intellectual property (e.g trademarks) or confidential information.** Ask your manager or PR first before you share company news that's not officially announced.
- ✘ **Do not share any defamatory, offensive or derogatory content.** You may violate our company's anti-harassment policy if you direct such content towards colleagues, clients or partners.

Representing our company through social media

If you handle our social media accounts or speak on our company's behalf, we expect you to protect our company's image and reputation. Specifically, you should:

- ✘ Be respectful, polite and patient.
- ✘ Avoid speaking on matters outside your field of expertise when possible.
- ✘ Follow our confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism and fair use.

- ⌘ Coordinate with our PR/Marketing department when you're about to share any major-impact content.
- ⌘ Avoid deleting or ignoring comments for no reason.
- ⌘ Correct or remove any misleading or false content as quickly as possible.
- ⌘ Maintain a professional Display Picture/Identification picture (if any) on social platforms such as LinkedIn, Slack, Skype, Glassbowl etc. where your identity directly links to and represents EsyCommerce.

Special Circumstance and Exception Non-compliance and Consequence

Please find below the reasons which can lead to Termination of Employment. This list in Non-Exhaustive

1. Gross misconduct or behavior which may result in disrepute to the employer;
 1. Misuse of office premises
 2. Misuse of assets made available for work
 3. Not disclosing to the management romantic relationship with a fellow staff member
 4. Willful insubordination or disobedience, whether alone or in conjunction with another or others, or of any lawful or reasonable order of a superior. The order of the superior should normally be in writing.
 5. Going on illegal strike either singly or with other workers without giving 14 days previous notice.
 6. Abetment of or attempt at abetment of any of the above acts of misconduct.
 7. Threatening, abusing or assaulting any superior or co-worker
 8. Drunkenness, fighting or riotous, disorderly or indecent behaviours while on duty at the place of work.
 9. Causing wilful damage to work in progress or to property of the employer.
 10. Conviction in any Court of Law for any criminal offence involving moral turpitude
 11. Betting, Gambling and Money lending business inside office premises
 12. Preaching of or inciting to violence.



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13. Refusal to accepted any charge-sheet or order or notice communicated in writing.
2. Any material or persistent breach of the terms contained in the contract;
 1. Disclosing to any unauthorized person of any confidential information in regard to the working or process of the establishment which may come into the possession of the workman in the course of his work or even after exiting employment
 2. Failure of Background check of Employment, Education qualifications
 3. Habitual late attendance and habitual absence without leave or without sufficient cause.
 4. Continuous absence without information and without satisfactory cause for more than two days as per the policy of ESYCOMMERCE
 5. Habitual neglect of work.
 6. Habitual indiscipline.
3. Any other reasons depending on the position occupied by the employee
 1. Failure to report any of the reasons mentioned above with respect to his / her reporting team members

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