

# **JS Group Code of Conduct**

# A) OUR VALUES

#### TRUST

We will be fair, honest, transparent and ethical in our conduct; everything we do must stand the test of public scrutiny.

#### EQUITY

It represents a belief that there are some things which people should have, that there are basic needs that should be fulfilled, that burdens and rewards should not be spread too divergently across the community, and that policy should be directed with impartiality, fairness and justice.

#### **SUSTAINABILITY**

We will integrate environmental and social principles in our businesses and we achieve this goal by actively considering the environment in the choices we make, aligning businesses, education, economics and technology to reduce our waste and carbon footprint.

#### INNOVATION

We constantly strive to redefine the standard of excellence in everything we do. Therefore, we are open to ideas that challenge the conventional views and drive innovation. The only constant in life is change and we believe that in order to stay relevant we must constantly improve with society's changing needs.

#### EXCELLENCE

We will be passionate about achieving the highest standards of quality, always promoting meritocracy.

#### B) SCOPE AND PURPOSE OF THIS CODE

- 1. This Code sets out how we behave with:
  - Our employees, or those who work with us;
  - Our customers;
  - The communities and the environment in which we operate;
  - All our value-chain partners, consultants, intermediaries;
  - Our joint-venture partners or other business associates;
  - Our financial stakeholders;
  - The governments of the countries in which we operate; and
  - Our group companies.



- 2. In this Code, "we or us" means our company, our directors, employees and those who work with us, as the context may require
- 3. The term "our group companies" in this Code typically means companies under Jiwanram Sheoduttrai Group
- 4. This Code sets out our expectations of all those who work with us. We also expect those who deal with us to be aware that this Code underpins everything we do, and in order to work with us they need to act in a manner consistent with it.

# C) OUR CODE OF CONDUCT

## I. Equal opportunity employer

- 1. We provide equal opportunities to all our employees and to all eligible applicants for employment in our company. We do not unfairly discriminate on any ground, including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law
- 2. When recruiting, developing and promoting our employees, our decisions will be based solely on performance, merit, competence and potential.
- 3. We shall have fair, transparent and clear employee policies which promote diversity and equality, in accordance with applicable law and other provisions of this Code. These policies shall provide for clear terms of employment, training, development and performance management

#### II. Dignity and respect

- 1. Our leaders shall be responsible for creating a conducive work environment built on tolerance, understanding, mutual cooperation and respect for individual privacy.
- 2. Everyone in our work environment must be treated with dignity and respect. We do not tolerate any form of harassment, whether sexual, physical, verbal or psychological.
- 3. We have clear and fair disciplinary procedures, which necessarily include an employee's right to be heard.
- 4. We respect our employees' right to privacy, with their conduct outside our work environment, related to social and religious associations unless such conduct impairs their work performance, creates conflicts of interest or adversely affects our reputation or business interests.



#### III. Human rights

- 1. We do not employ children at our workplaces.
- 2. We do not use forced labour in any form. We do not confiscate personal documents of our employees, or force them to make any payment to us or to anyone else in order to secure employment with us, or to work with us.

# IV. Bribery and corruption

- 1. Our employees and those representing us, including agents and intermediaries, shall not, directly or indirectly, offer or receive any illegal or improper payments or comparable benefits that are intended or perceived to obtain undue favours for the conduct of our business.
- 2. However, a J. S. Group company and its employees may accept and offer nominal gifts, which are customarily given and are of a commemorative nature, for special events provided the receipt or presentation of the same, irrespective of value, are disclosed to the company.

# JIWAN

# V. Integrity of information and assets

- 1. Every employee of any J. S. Group Company shall use all resources made available by the company for the purpose of conducting business, ensuring that they are not misused. These include tangible as well as intangible assets. Hence we shall strive to:
  - a) Protect the confidential information about products, processes, proprietary information, clients / customers / suppliers and other such data.
  - b) Protect and enhance the good-will developed among the various stake-holders over a period of time through our behaviour and business practices.
  - c) Mitigate risks through a thorough "due diligence", disclosure of all aspects of business to appropriate authorities within the company and good business practices.'
  - d) Protect the intellectual property of the company and the J. S. Group and its stakeholders.



## VI. Usage of Internet & Email

- 1. Every employee is responsible for using the Company's assets and infrastructure appropriately, ethically, in a safe and secure manner and within the law. Towards this end, every employee must adhere to the following guidelines while using internet and email.
  - a) Notsendoffensiveemailsandmessagestoanyperson/groupwithinoroutsidethecompany.
  - b) Not important non-text files including files received as e-mail attachments on to your system without checking for viruses.
  - c) Notvisitobsceneorillegalmaterialoranymaterialthatisoffensiveinanyway.
  - d) Not download any unauthorized software. All software used by employees to conduct Company business must be appropriately licensed.
  - e) Not share any report, files, data or source code with any unauthorized person/group/organization through the internet.
  - f) Not use the email system to copy and/or transmit any documents, software or other information protected by copyright laws.
  - g) Not create email congestion by sending trivial messages or personal messages or copying e-mails to those who do not need to receive them.
  - h) Not transmit company propriety information like reports, files, data and source code to any unauthorized person, group or organization through email or any other tool.

#### VII. Relation with our Stakeholders

- a) We shall cultivate and build a global network of collaborative, long-lasting and mutually beneficial relations with all its stake-holders, creating lasting value for all involved.
- b) We shall conduct our business with the highest standards of integrity and best business practices.
- c) Provide services and products that are technically and commercially competitive and provide best value to the customer or client.
- d) Avoid giving false, incomplete and misleading information to clients and customers in the course of tendering and marketing.
- e) Address all customer complaints and grievances, sincerely and promptly to the satisfaction of the aggrieved stake-holder.
- f) Respect partner, client, customer policies and practices and be sensitive to local customs, traditions and norms as well as locally applicable laws and regulations.
- g) Design and implement procurement policies, procedures and practices that are fair, transparent and in keeping with the letter and the spirit of the contract.



#### VIII. Safe and respectable Work Environment

- 1. The attitudes and behaviour of all J. S. Group employees contribute towards a safe, secure and hygienic work environment. This includes being concerned and conscious of one's own safety and that of our co-workers and visitors.
- 2. Treat everyone with dignity and respect in our behaviour that is fair, just and honest.
- 3. Trust the motives and integrity of our co-workers, take their concerns and opinions regarding all aspects of the work-place seriously and give it due importance.
- 4. Conduct ourselves in our behaviour, words and deeds in a manner that is not offensive, intimidating or hurtful to our co-workers.
- 5. Do whatever we can towards a clean, safe, secure, healthy and hygienic work-place.

# IX. Communities and Environment

- 1. We are committed to good corporate citizenship, and shall actively assist in the improvement of the quality of life of the people in the communities in which we operate.
- 2. We encourage our workforce to volunteer on projects that benefit the communities in which we operate, provided the principles of this Code, where applicable
- 3. We seek to prevent the wasteful use of natural resources and are committed to improving the environment, particularly with regard to the emission of greenhouse gases, consumption of water and energy, and the management of waste and hazardous materials. We shall endeavour to offset the effect of climate change in our activities

# D) VIOLATION OF THE CODE (Reporting Concerns)

Each employee must report actual or potential violation of this code of conduct or applicable laws to the Company's HR and Directors. The Protected Disclosure should be submitted in a closed and secured envelope. Alternatively, the same can also be sent through email to the HR/ Directors.

# E) CONSEQUENCES FOR PROVEN VIOLATIONS

All protected disclosures under this policy will be recorded and thoroughly investigated. Violations of this Code, Company Policy or the law will attract disciplinary action—up to and including termination. Violations also include any false allegations, regardless of whether they are made anonymously. Legal and ethical misconduct can also subject the individuals involved and JS Group to fines, penalties and civil or criminal prosecutions.



# F) OUR RESPONSIBILITY

## 1. Employee responsibilities

- 1.1. Read and be familiar with the information in our Code
- 1.2. Affirm that you have acted in accordance with our Code
- 1.3. Act in a manner that is safe, ethical and consistent with applicable laws and regulations and Our Code.
- 1.4. Raise questions and concerns if you become aware of possible violations of our Code of Conduct.
- 1.5. Cooperate fully when responding to an investigation or audit.

# 2. Additional responsibilities of departmental heads

- 2.1. Be a positive role model and support your team members by:
- 2.2. Creating an environment that is respectful and inclusive.
- 2.3. Encouraging them to speak up,
- 2.4. Listening and responding to concerns when they are raised.
- 2.5. Doing your part to make sure that no one experiences retaliation for speaking up or cooperating in an investigation.
- 2.6. Help your team members understand the requirements of Our Code and applicable laws.
- 2.7. Be consistent when enforcing our requirements and holding people accountable for their behavior at work.

#### 3. Additional responsibilities of Management

3.1. Directors and the entire management shall also be responsible to perform the duties specified as per the statutory acts and other relevant laws.

#### 4. Speak up:

4.1. Each of us has a responsibility to speak up if we see something unsafe, unethical or potentially harmful. If you have a question, need help or want to raise a concern, please report to the HR/Directors.

"We at JS Group shall ensure our work place is a Safe, Clean and a Happy space"