

2021

CODE OF CONDUCT

ATOMBERG TECHNOLOGIES PVT. LTD.
CONFIDENTIAL

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OBJECTIVE

The Code of Conduct is designed to assist the Atomberg Technologies members to live up to all applicable laws, industry standards, and organizational values. The code will provide guidance and set the expectations from each stakeholder of the company. The code promotes ethics, honesty, and professionalism within the company and among its members. Failure to comply with the code will be treated seriously and may result in disciplinary action, up to and including termination.

The company believes in being an integrated organization and that the action of every member affects the entire organization and its reputation. Every member is obligated to strive to secure the company's interests within legal limits and prevent damages or loss to the company. The company expects all members to abide by this code while carrying out their duties and functions to preserve public trust and ensure the company's sustainable growth and development.

The code does not cover every circumstance or situation because the laws of each country vary. When members are confronted with situations that are not covered by the code, they must consider the spirit of the code and Atomberg's values before making a choice based on common sense and good judgment. If any member has any doubts, they should seek advice from their supervisors or HR representatives or the Code of Conduct Committee.

The provisions of the code shall be in addition to, not in derogation of, the provisions of any other legislation now in effect. Members may apply local norms where variations arise as a result of local conventions, norms, laws, or regulations.

If your compliance with the code contradicts any local laws and/or practices, kindly inform the Code of Conduct Committee as soon as possible. The code outlines corporate conduct norms that apply to everyone in the company, regardless of location. In the spirit of trust and membership, the organization will support and stand by all decisions made by Members.

SCOPE AND PURPOSE

The code applies to everyone working for the company regardless of location, role, or level of seniority. The code sets the precedence of how we behave with the various stakeholders in the market. The scope of this code extends to:

- our members;
- our customers;
- the communities and the environment in which we operate;

- our value-chain partners
- our financial stakeholders; and
- the government

The code lays out the expected ethical standards of conduct and behavior and the mechanisms that will enable them to be upheld and serves as a guide for all members on what to do, how to do it, and most importantly, what not to do.

For the purpose of this code, the following terms will have the assigned meaning to it as hereunder, unless the context otherwise requires

1. "Member" means
 - i) a director (executive or non-executive) and an employee whether part-time or full time, fixed term, a permanent trainee of Atomberg Technologies, its subsidiaries and all corporates in which Atomberg Technologies or its subsidiaries have management control; or
 - ii) an individual who is a temporary staff, intern, apprentice; or
 - iii) a third party or parties who represent the company or act on behalf of the company
2. CEO means the Chief Executive Officer of the company
3. The core team includes the following members:
 - i. Manoj Meena
 - ii. Sibabrata Das
 - iii. Arindam Paul
 - iv. Ankur Agrawal
 - v. Nipun Agarwal
 - vi. Vaibhav Naringrekar
 - vii. Utkarsh Gautam
 - viii. Gaurav Gupta
 - ix. Saurabh Paswan
 - x. Manish Bansal
4. Company/ Atomberg/ We shall mean Atomberg Technologies and its subsidiaries
5. "Improper Activities" shall mean activities including but not limited to:
 - i) Questionable accounting, internal accounting controls, or auditing matters
 - ii) Disclosures in documents filed by the company with statutory authorities and other public disclosures made by the company that may not be complete or accurate
 - iii) Fraudulent financial reporting
 - iv) Violation of any policies of the company
 - v) Violation of laws applicable to the company
 - vi) Forgery or alteration of any documents
 - vii) Misappropriation or misuse of Company resources, such as funds, supplies, or other assets;
 - viii) Pursuits of a benefit or advantage in violation of conflict of interest policy of the company stated herein above
 - ix) Unauthorized alteration or manipulation of computer files

- x) Disclosure of confidential information without any authorization
 - xi) Any other act or omission which involves gross misconduct and/or violation of any provision of this code
6. Relatives include spouse, parents, parents-in-law, children, and siblings

EQUAL OPPORTUNITY EMPLOYER

The company strives to provide a work environment free of discrimination and harassment. We are an equal opportunity employer, and employment decisions are based on merit, business needs, and qualifications directly related to professional competence.

We provide equal opportunities to all our members and all eligible applicants for employment in our company. We do not unfairly discriminate on any ground, including race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability, or any other category protected by applicable law.

Members and value chain partners will be recruited/onboarded, selected, developed, transferred, and progressed based on merit and business requirement. Members will treat all other Atomberg Members and Value Chain Partners with dignity, kindness, and respect, regardless of race, caste, color, religion, gender identity, age, national origin, sexual orientation, marital status, physical impairment, political affiliation, or any other factor.

You should never

- Discriminate candidates on the grounds mentioned above
- Be involved in a hiring process that involves your relatives as candidates
- Influence a hiring decision unethically to benefit someone from your family or friends

You should always

- Shortlist potential candidates and vendors based on merit
- Notify your supervisor about a conflict of interest, like being involved in a hiring process that involves your partner or immediate family member

FAQs

Q. My brother has applied for a job in Atomberg, and I'm involved in the hiring process for that role. Who should I notify?

A. You should immediately inform your reporting manager about the conflict of interest. It is prohibited to be involved in the hiring process of a family member, so you will have to move out of the process. Your reporting manager shall decide accordingly to keep the hiring process fair.

HARASSMENT

Harassment means any verbal, written, or electronic communication, including social media, which is abusive, threatening, or harmful, inappropriate jokes, use of foul language, circulation, or display of offensive materials aimed at an individual or across the spectrum. These acts may create a hostile environment that is intimidating, insulting, or offensive and may instill fear based on gender, race, religion, belief, or any other difference.

Harassment includes but is not limited to

- bullying, mistreatment,
- verbal abuse,
- excluding or isolating behavior,
- deliberately withholding information vital for effective work performance,
- misuse of position in the company to acquire an unfair advantage
- giving members impossible assignments,
- physical abuse and aggression,
- threats of physical or emotional damage
- discrimination based on race or religion
- sexual harassment, or
- any conduct which is a health or security risk to a member

Further, for an act to be considered harassment, it does not require the intent to offend. Any improper conduct, including jokes, pranks, or even a statement intended as a compliment that can contribute to harassment, will also be included in the purview of harassment.

Atomberg complies with all country and local laws prohibiting harassment, as well as our Code of Conduct. Atomberg tries to provide a harassment-free environment, and all members are responsible for ensuring that all premises and facilities are harassment-free.

We have zero-tolerance for any form of harassment, whether sexual, physical, verbal, or psychological. Harassment has significant repercussions and is likely to result in instant termination as well as other punitive measures.

You should always

- Be sensitive towards cultural differences
- Report an act of harassment if you are a witness to it

You should never

- Remain silent about harassment even when you are not the subject of it
- Indulge in any form of harassment that may result in interfering with an individual's performance or confidence
- Defame someone under any circumstances
- Exclude/ boycott a person from office-related social activities or teamwork without just cause; this may also constitute harassment
- Tolerate any form of harassment at the workplace

FAQs

Q. How do I report an instance of workplace harassment?

A. In case you face any kind of harassment, you can report it to your immediate supervisor, grand supervisor, HR manager, or a member of the COC committee. You shall also write an email to the COC Committee. The committee will conduct an inquiry meeting within five working days.

Q. When something goes wrong, my manager scolds me in front of the entire team and humiliates me all the time. If I protest his behavior and his use of abusive words to criticize me, I am threatened that I might be terminated due to poor performance.

A. Your boss is behaving in an unprofessional, intimidating, and disrespectful manner, which is a violation of the code. Please bring this to the attention of your HR, your skip manager, or the COC committee. You shall also write a mail to the COC Committee.

Q. My colleague cannot speak Hindi fluently and is working in North India for the first time. His manager makes fun of his accent, language, and attire, as well as his hometown and habits. Other team members occasionally join in the bullying, while a handful either remain silent or complain politely. Is there anything that can be done about this?

A. This is unfair discrimination and a violation of the COC. To deal with this scenario, your colleague will need all of your help and support. You might want to discuss this privately with your reporting manager. You can contact HR anonymously if you feel inclined to do so.

Q. I accepted my boss's request to be a Facebook friend over a year ago because several of my office colleagues are in the same group, and I didn't want to insult him. Some of my boss's recent Facebook chats and Whatsapp messages have been highly personal and intimate, including explicit language, and they have continued despite my polite requests to cease. My colleagues think I am overreacting, am I?

A. If your boss's gestures and messages are bothering you, you have every right to ask him to cease right now. Keep your skip manager and HR informed as well. If you don't feel comfortable addressing this with the authorities mentioned above, contact the COC Committee.

PRIVACY OF MEMBERS

All members are expected to respect the privacy of other members. Members must abide by all applicable local, national, and international privacy and data protection laws and Atomberg's internal policies.

- Personal information on a member may only be obtained with the member's prior consent.
- Personal information about members must be reasonable, relevant, and not intrusive in regard to the purpose for which it is collected. Such data must only be used for the reason it was gathered, and it must not be kept for longer than is required.
- All personal information about members must be kept private and safe.

Information should only be used for Atomberg's objectives and should not be shared with anyone else. Even within Atomberg, confidential information should be accessible only to those required to execute their business.

LAWS OF THE LAND

Atomberg promotes and strives to ensure compliance with the applicable laws in each territory that we conduct our business. Members shall also adhere to internal rules and regulations as they apply in a given situation. Those internal rules are specific to the company and may go beyond what is required by the law.

All members shall note that the company shall never be liable for or defend any Member who acts in contradiction to applicable laws. The violation of any law, regulations, rules, and orders may make members liable for criminal or civil action, in addition to any disciplinary action

that the company may take for such violation. Each member is expected to highlight any non-compliance suspected or noticed by any Member.

Members must not do anything that has been advised to be illegal. Where an activity related to work carries significant legal risk, they must not proceed without express Senior Management approval.

Members must immediately seek advice from their function head or the COC Committee in the following situations:

BRIBERY AND CORRUPTION

What is a bribe?

A bribe is anything of value that may be seen as an attempt to influence an action or decision to obtain or retain business or acquire an improper advantage. This could include money, gifts, favors, company resources, entertainment, or other valuable items.

What is corruption?

Corruption is dishonest behavior by those in positions of power, such as managers or Government Officials. Corruption can include giving or accepting bribes or inappropriate gifts, under-the-table, diverting funds, laundering money, and defrauding investors.

We must always compete for business based on the quality of our products. Each member should always encourage and ensure meritocracy and legal conformity and should always follow both of these principles while dealing with third parties. Bribery and corruption in any form are not tolerated at the company. Dealings with government authorities pose an exceptionally high risk: simply the perception of illicit behavior could jeopardize the company's reputation.

Each member undertakes that they shall, during employment in the company or thereafter must never, directly or through intermediaries, offer or promise or seek or receive for himself or for any relatives, friends or other related parties; any personal or improper financial or other advantages, to obtain or retain a business or additional benefit from a third party.

Atomberg does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain.

What does anything of value mean?

Cash payments, gifts, entertainment, excessive business promotional activities, covering or reimbursing expenses, investment opportunities, shares, securities, loans or contractual rights, the promise of future employment, payments under consulting agreements, subcontracts, stock options, and similar items of value.

"Anything of value" in every context shall be read to have the broadest possible interpretation to include but not be limited to any goods, services, or merchandise, such as cash, cash equivalents, gift cards, vouchers, hospitality, meals, event tickets, retail certificates, entertainment, travel perks, use of vacation homes, airfare or accommodations, special favors or privileges, such as educational or employment opportunities for friends and relatives, stock options, donations to designated charities, discounts, personal services, loans, co-signing of a loan or mortgage, or a promise of future employment.

Regardless of where they live, where they were born, or where they work, each member must follow all applicable anti-bribery rules. Furthermore, all Members must adhere to the Prevention of Corruption Act, 1988, in India, and any other applicable law in the jurisdiction of employment.

As this policy applies to our commercial operations, the restriction must apply to all of our members and anybody operating on the company's behalf, such as agents, consultants, suppliers, and contractors. Bribes and facilitating payments to government officials of any type are prohibited, and both are considered violations of our Code of Conduct.

You should never

- Offer or accept money, gifts, privileges, favors, entertainment, other arrangements, directly or indirectly to or from a business partner, client, prospect, government official in exchange for company business, improper advantage, faster service, personal gain, other benefits that could cause unethical or illegal exposures

You should always

- Notify the COC committee via email, keeping HR in CC about any gift received, irrespective of its value.
- Accurately record a gift before sending it to a stakeholder for official purposes

GIFTS AND HOSPITALITY

As a Company operating all over the country, we operate in many diverse environments, where certain activities serve as an expression of politeness and gratitude. All members must respect the cultural norms to the extent possible under the local laws and regulations we are governed by while ensuring that none of the activities violate this code.

Some customary activities may include modest forms of hospitality, such as lunches or dinners and occasional gifts of minimal value, which do not influence an individual's clinical or business decisions. Each member shall always use their fair judgment while interpreting the "customary" or "modest" approach and must at all-time ensure compliance with applicable laws.

Likewise, it is sometimes appropriate to offer reasonable gifts, e.g., in the context of promotional events or product launches. However, as accepting or receiving gifts and hospitality can be open to abuse or generate actual or perceived conflicts of interest, this should occur sparingly and always be legitimate and proportionate in the context of Atomberg's business activities.

In case of doubts, the Members shall seek clarity or approval from the direct reporting manager or a member of the COC Committee.

Following gifts are inappropriate and should never be given or accepted:

- Gifts that are illegal in nature (against the law of the land)
- Gifts that are offered for anything in return or improper business advantage
- Gifts for which members pay personally to avoid reporting or seeking approval
- Any monetary or cash equivalent present (such as gift certificates, loans, stock, stock options).
- Any obscene or sexually oriented entertainment that violates the organization's commitment to mutual respect or otherwise harms its reputation
- Gifts that are in the form of gold or any precious metals
- Accepting gifts, discounts, favours, or services from an existing or potential customer, competitor, or supplier is banned if the receipt could influence or cause a person's business choice toward that or another client, customer, or competition
- Gifts in the nature of a bribe, payoff, kickback, or facilitation payment.

The following are some examples of appropriate gifts:

- Entertainment: occasional participation at regular sports, theatre, and other cultural events

- Gifts: gifts of minimum value, such as candies, dried fruits, pencils, calendars, or tiny promotional goods
- Dinners: occasional modest meals with someone with whom we conduct business

FAQs

Q. One of the vendors sometimes sends a cake or chocolates as a token of appreciation. Can I accept it?

A. As cakes or chocolates tend to be of limited value, and you receive them infrequently, it is unlikely that you would feel obligated or influenced by them. If that is the case, you can continue to accept them. However, you must notify the COC committee via email, keeping HR in CC. You are, however, encouraged to share the gift with your team.

FREEDOM OF ASSOCIATION

We recognize the importance of our members being interested in involving themselves in civic or public affairs in their personal capacities. However, these activities should not create a conflict with the company's interests. Members interested in doing so must notify the same and seek approval for such activities.

Accepting a position of responsibility outside our company in any public establishment should not interfere with your ability to work effectively at Atomberg. All our members who have similar commitments must seek approval from COC Committee for such activities. Refer to the section on Conflict of Interest below.

Each member is free to support any legal, political organization, group, or association, and to donate their time and support to candidates and/or parties of their choice, provided that they respect the individuality of their fellow colleagues and do not allow their personal interests to interfere with the Atomberg's business operations. Individual participation by a Member, on the other hand, must be voluntary, on the member's own time, and at the member's own expense, as stated in a declaration to the Supervisor and the Code of Conduct Committee. If the member's involvement necessitates a leave, they must apply for a leave stating the reason.

We respect our members' individual identity. Views expressed by our members on social media are their personal views and do not represent our company's opinion.

FAQs

Q. My partner is starting a company and wants to appoint me as a director to fulfill regulatory requirements. I will also be a majority shareholder in the company, which is in the business of psychological consultation. Is there a problem if I do this?

A. As per the information, it appears your partner's business is not the same as that of Atomberg. But it is important to note that you should not use Atomberg's time, property, or resources to help another business. It is also mandatory for you to notify the COC Committee via email, keeping your reporting manager in CC.

INTEGRITY OF INFORMATION AND COMPANY ASSETS

What are company assets?

All assets but not limited to

- funds,
- electronic devices,
- equipment, materials, and resources,
- information intellectual property rights,
- software,
- confidential or proprietary information,
- consumer information,
- internet,
- all facilities provided at the workplace

Members are responsible for the proper use of the Company assets at their disposal, including those provided for their job/work performance. Members must safeguard such properties/asset (s) against loss, damage, misuse, or theft.

Members are, however, allowed to utilize office facilities such as phones, computers, printers, copier machines, scanners, and internet bandwidth for restricted personal usage reasonably to increase productivity and work-life balance. It is essential while doing that members ensure that organizational assets are not misused or wasted.

Members at all times shall protect the confidentiality of company information and not disclose it to anyone. All undisclosed financial data or information, strategic business plans,

product architectures, source codes, product plans and road maps, proprietary and technical information, intellectual properties such as trade secrets, trademarks, and patents, member details, consumer data, list and names of suppliers, vendors, and dealers, and financial information are examples of confidential information. This section of the code applies to the members even after they move out of Atomberg.

The company has provided restrooms to transgenders. It is important to ensure that transgender individuals can access facilities comfortably and safely. These facilities should have adequate privacy, be well-maintained, and clearly signposted.

You should always

- Respect and protect all confidential information and intellectual property of our company.
- Safeguard the confidentiality of all third-party intellectual property and data.
- Promptly report the loss, theft, or destruction of any confidential information or intellectual property and data of our company or that of any third party

You should never

- Disclose confidential company information unless the company has specifically provided "written consent" for the same. This includes disclosures through any forum or media, including through social media.
- Use information about clients, our organization, or other parties, which has been gained through employment or affiliation with Atomberg, for personal advantage or the benefit of third parties.
- Use all company assets, tangible and intangible, including computer and communication equipment, for a purpose other than for which they are provided and in order to conduct our business.

PROHIBITED DRUGS AND SUBSTANCES

Working under the influence of alcohol, drugs, or any other controlled substances or misused prescription medicine on or off Atomberg premises is prohibited. If members work under the influence of drugs or alcohol, they pose an unacceptable safety risk to themselves and others.

All forms of substance abuse and the possession, consumption, and distribution of drugs are strictly prohibited at our workplaces or during company duties.

Members coming to work under the influence of alcohol shall be asked to leave the premises immediately. They shall be presented in front of the COC Committee before allowing them to work again. They shall only start working once the COC Committee has reviewed their case and allowed them to.

You should always

- Report a person under the influence of alcohol or any other prohibited substance in the workplace
- Keep the workplace alcohol and drug-free

You should never

- Arrive at work under the influence of alcohol or any other prohibited substance
- Consume, possess or distribute alcohol or any other prohibited substance at the workplace

FAQs

Q. On occasion, a coworker shows up at work under the influence of alcohol. He has confided in me about his personal problems and is extremely stressed. He's a nice friend, and I understand that he needs his job and is the family's single breadwinner. I've attempted to counsel and assist him, but it hasn't worked. So, what should I do now?

A. Being under the influence of alcohol or drugs at work is a safety danger, and it also lowers the office's dignity and reduces productivity. Because his thought process is hampered when he is drunk, your colleague may make mistakes at work that can be costly to the company. You should speak with your manager about it and notify the COC Committee. Your coworker may require assistance and support to address his problem.

OCCUPATIONAL HEALTH AND SAFETY

We remain committed to protecting and building a safe and healthy workplace by promoting a safety culture. We are committed to providing a healthy and safe working environment, equipment, technology, and systems to our team and associated stakeholders. Atomberg also prohibits possession of weapons in the workplace.

You should always

- Comply with health and safety procedures and instructions relevant to your work and about which you have been trained or notified
- Undertake work that you are trained, competent, medically fit, sufficiently rested, and alert enough to do
- Cooperate and contribute actively to health and safety

- Promptly notify your reporting manager or manager in-charge about any unsafe working conditions

You should never

- Possess and/or use weapons/firearms or ammunition while on the business of the company unless required as part of your role (for instance, for security personnel where deemed necessary)

CONFLICTS OF INTERESTS

When a member's interest clashes with Atomberg's and creates a conflict of interest, the member is expected to act in the best interests of Atomberg as opposed to pursuing personal interests or become divided in loyalty. Such influence or interference may be caused due to a member or his relatives, friends, or acquaintances; personal, social, financial, or political activities. In such a situation, the member should first disclose and seek guidance where necessary from their manager or the HR team.

At the time of appointment, members shall fully disclose to the hiring manager any interest leading to an actual or potential conflict. This conflict may arise if their immediate family (including parents, siblings, spouse, partner, children) or persons they enjoy close personal relationships with are our competitors, suppliers, customers, or distributors, or have other business dealings with our company.

Should any actual or potential conflicts of interest arise, the concerned person must immediately report such conflicts and seek approvals as required by contacting the COC Committee. The COC Committee shall revert to the member within a reasonable time to enable the concerned member to take the necessary action to resolve or avoid the conflict in an expeditious manner. An open and honest discussion can often resolve conflicts. It is important to note that having a conflict of interest is not necessarily a violation of the code, but not disclosing it is.

Few instances that shall always be avoided are illustrated below:

- Engaging in activities that directly or indirectly compete with, or may likely compete with, the company's present or future operations and interests;
- Allowing personal or family interests, connections, or relationships to influence a member's business decisions;
- Hire, supervise, or have a direct or indirect line of reporting to a family member or someone with whom a Member may have a relationship, including but not limited to a

romantic relationship, which relationships may provide a member with undue preference or influence on a line manager's decisions toward such manager;

- Accept any parallel employment with suppliers, customers, or competitors, or engage in any activity that strengthens or promotes a competitor's position against the company, or gives such a competitor a chance to acquire an advantage over the company;
- Work for, provide services to, have a financial interest in, or receive any personal benefit from a supplier, customer, competitor, or company that does or seeks to do business with the company if such relationship or interest has the potential to influence, or appear to influence, a member's business decisions;
- Taking use of commercial prospects identified within the company for the benefit of a third party. Such prospects should belong to the company first;
- Developing or assisting in the development of outside inventions or products that
 - a) relate to the company's existing or reasonably anticipated products and services,
 - b) leverage a Member's position at the company, or
 - c) are developed using the company's corporate resources;
- If a Member is involved in a relationship with a coworker. In that case, the two Members must discuss and disclose the relationship to their respective supervisors or the Code of Conduct Committee, as this may result in a potential conflict of interest. The company will take steps to ensure that the Members' disclosures are handled sensitively, and it may, if necessary, make adjustments to the member's working environment or reporting structure, including transferring one or both Members, to avoid any conflict.

You should always

- Disclose any such conflict of interest as mentioned above to the Code of Conduct Committee
- Notify the COC Committee about any relative working directly with a competitor of Atomberg. Relative here includes your partner, parents, parents-in-law, siblings, or children.
- Declare to the COC Committee about any substantial interest that you may have in another company or entity. The substantial interest here means anything more than 1% of the company's stocks. However, if you have discretionary authority to deal with such a company, any investment will be considered a conflict of interest.

You should never

- Engage directly or through a relative in an entity that has a business relationship with the company or offers services/ products to the company
- Have a financial or strategic interest in an entity that has business relations with the company without notifying the COC committee
- Provide services/ products to an entity that is a competitor to the company

- Misuse company's resources or name to promote an external activity, even if for a charitable cause and done for free
- Influence, even if indirectly, a business transaction in which a relative or a friend is involved, particularly when in a leadership position
- Obtain favors, discounts, or special privileges from an entity or person who can or intends to engage in a business relationship with the company.

FAQs

Q. My partner accepted a job offer from a competitor of Atomberg, but we never discuss work with each other. Neither do we disclose the business practices of our respective companies to each other. Do I still need to notify someone?

A. Yes, you must immediately notify your reporting manager and the COC Committee about the same. This is to ensure that a potential conflict of interest is addressed at the earliest. The reporting manager will ensure no conflict of interest with your role by discussing it with the COC Committee.

Q. I am in a relationship with a colleague, but we rarely have to work together. Do we still need to inform our reporting managers about it?

A. Yes, you both must notify your reporting managers about it. Reporting managers will ensure as per their discretion that no conflict of interest shall affect the company's business interests. If found necessary, the manager can make a change to members' work environment or reporting structure.

DEALING WITH STAKEHOLDERS

CUSTOMERS

We firmly believe that our customers are one of the most important reasons for our success today. We shall be professional, fair, and transparent in our dealings with them. We respect our customers' right to privacy in relation to their personal data. We shall safeguard our customers' data in accordance with applicable law.

You should always

- Be responsive and polite in all your dealings and discussions;

- Represent fairly and correctly the available information; do not exaggerate the quality, features, and availability of a product or service
- Endeavor to understand the issue from the customer's perspective and try to provide solutions
- Never share confidential and personal information of the customer with any person unless legally required

You should never

- Raise your voice or abuse a customer even if they do not have a valid complaint
- Provide misleading or false assurances or information at any time

VALUE CHAIN PARTNERS

"Value Chain Partners" are any external person/body of persons/company/organization we do business with. They could be advertising agencies, distributors, consultants, vendors, suppliers, third-party manufacturers, etc.

Atomberg values its relationship with all partners and acknowledges their contribution to its success and growth. We aim to create an equitable and conducive atmosphere for doing business with us. We seek to engage in business with suppliers and service providers who display a similar set of values, and we expect them to adopt ethical standards similar to ours.

You should always

- Appoint them only on merit and no other personal or unfair consideration
- Deal with them on a professional basis only
- Ensure that all partners are made aware of the need to comply with the provisions of this code
- Disclose any personal relationship with a potential value chain partner and ensure that you are not involved in any manner in the selection process or in negotiating the terms
- Act in the interest of the company in all transactions with value chain partners
- Treat them with respect and courtesy while ensuring adherence to the terms of the agreement

You should never

- Accept any favor in cash, kind, or any facility that is done to obtain undue favors
- Seek benefit in proceedings with value chain partners through gifts, cash, or any other facility

- Influence the process of selecting a value chain partner to benefit your relative or friend

GOVERNMENT

The company's business is in a regulated sector, and members engaged in working with government agencies like regulators, taxation officials, local authorities, and such are required to build relationships of trust based on transparency and fairness at all levels.

Atomberg complies with all the local laws that apply to government-related activities and prohibits improperly influencing government officials.

We do not support any specific political party or candidate for political office. We do not seek to influence the outcome of public elections or undermine or alter any system of government.

You should always

- Ensure that the highest standards of business conduct are followed
- Contact or engage with the relevant government agency only if authorized to do so on behalf of the company
- If in doubt, escalate the matter to your seniors, do not attempt to resolve it on your own
- Be careful to provide accurate and complete data when information or documents relating to the company are sought to cooperate fully and courteously with officials who are authorized to conduct an investigation or inquiry or seek information or data
- Retain and preserve all relevant information and data for reporting, compliance, or investigation

You should never

- Attempt to exert undue influence to obtain a favorable decision
- Knowingly destroy, alter, conceal any records or data in physical/ electronic form
- Obstruct directly or otherwise, access to information or records that are sought
- Provide false or misleading information or create incorrect data or records

FAQs

Q. A government regulator has sought data from our office of production numbers and other sensitive financial data for the past year. I worry that sharing such information will expose our business model to competition and may harm our business interests. What should I do in this case?

A. It is prohibited to conceal, alter or destroy any information that the investigating authorities may ask as per the code. Hence, you must present as accurate data as possible. However, it would help if you informed the regulator in writing while submitting the data that the confidentiality of the data should be maintained.

ENVIRONMENT

We are committed to environmental sustainability in the production of our products and comply with all applicable laws and regulations.

We pledge to prevent the wasteful use of natural resources and are determined to improve the environment, particularly about energy consumption.

FINANCIAL RECORDS AND REPORTING

Our members shall timely inform our financial stakeholders of relevant aspects of our business and comply with the applicable laws. We shall also maintain accurate records and adhere to disclosure requirements in accordance with applicable laws and industry standards.

- Financial data (e.g., books, records, and accounts) must comply with both GAAP and the company's reporting policies.
- All information given for employment records should be truthful and factual.
- All information that is not in the public domain will be treated with caution by the member.
- Any information that is designated as confidential should be treated as such.

Our members shall not make any willful omissions or material misrepresentation that would compromise the integrity of our records, internal or external communications, and reports, including the financial statements.

FAQs

Q. My boss excels at what he does and is very popular within the team. However, he does have a habit of altering sales numbers. I respect him, but I worry about fiddling with the system to produce better-than-expected results. I'm hesitant to complain about him because he is a senior member well-liked by upper management. I'm also concerned that if I manipulate the figures, I'll be held responsible if I'm detected because his instructions are vocal. What should I do?

A. The company's financial situation may be impacted by changing sales figures. Any manipulations will be a misrepresentation of facts and will impact the accuracy of the numbers. Hence they are strictly prohibited. You should contact your HR Manager or skip-level manager right away and explain your situation. You shall also reach out to any member of the COC Committee.

EXTERNAL COMMUNICATIONS

Effective communication with the media is crucial for Atomberg's success and public image. The information related to Atomberg should therefore be completely consistent and accurate. All external communication regarding any information relating to the company maybe done only by authorized spokespersons. No other person is allowed to speak with or disseminate information or provide views about the company with external parties. We shall never misrepresent any facts relating to our company.

You should always

- Direct any caller from the media to the authorized spokesperson and notify the code of conduct committee via email about the same
- Seek the approval of your manager before accepting a proposal to speak at a public forum through email, keeping the COC committee in CC

You should never

- Use confidential or proprietary information of the company in public forums
- Disclose or discuss confidential information of the company with friends, family, or third parties

- Post on a social networking site or give to the media (whether on or off record) any casual comments that may be mistaken or imply endorsement of the same by the company

FAQs

Q. I am being invited to participate in a TV program as an expert in a panel discussion. Can I accept the invitation?

A. Since you are invited as an expert, you can participate after informing the COC committee. You should, however, remember to state that views expressed by you during the show are personal and not that of the company.

Q. A newspaper has reached out to me seeking the company's reaction to the new labor codes. Can I comment on it?

A. As already mentioned in the code, only the authorized spokespersons of the company are allowed to represent the company. You should inform them that you are not the authorized spokesperson of the company. You should let the COC committee know about it to direct them to the authorized spokesperson if they deem it necessary.

INTERNAL COMMUNICATIONS

Any communication made through emails or WhatsApp groups should be strictly business-related. No member shall make remarks or statements that are offensive to another member.

Individual feedback in all circumstances shall be provided on a one-to-one basis only. The managers or other members should not give feedback to individual members in a social media group or in front of other members.

It is understandable that informal conversations, sharing of jokes, and friendly banter might occur in the workplace between colleagues. However, it should be noted that such discussions must happen in a manner that does not offend anyone or make anyone feel uncomfortable, including someone who might overhear it. Therefore, members must use appropriate language and maintain decorum at the workplace.

USE OF THE INTERNET AND SOCIAL MEDIA

Members are responsible for the proper and ethical use of all electronic communications devices within the company, including computers, email, Internet connections, intranet and extranet connections, and any other public or private networks, voice mail, video conferencing, and telephones.

Any other type of electronic communication currently or in the future utilized by Members is similarly intended to be covered by this code. It is impossible to include all of the rules and regulations that apply to the usage of electronic communications devices. As a result, when using any function of our communications systems, members are recommended to use it with caution.

Members handling the company's social media accounts must do so with utmost caution and ensure the public image of Atomberg is not hampered by their actions. They shall not use the company account for personal work or browsing.

GRIEVANCE REDRESSAL MECHANISMS

CONTACT POINTS

If members have a query or worry about legal or ethical standards, they can reach out to any senior members who can assist them in resolving their issues. Members can choose to use any of the methods listed below.

1. Email your concern at coc@atomberg.com
2. Personally reach out to any member of the COC Committee as per the details in the annexure, who will then assist you throughout the process
3. Reporting manager
4. HR manager
5. In case of concern regarding sexual harassment, members also have the option of contacting the Internal Committee or any member as per the details in the annexure
6. In case of concern regarding welfare and protection of rights of transgender persons at the workplace we have a designated complaints officer -Nipun Agarwal (Employee Code-1430) and the grievance can be mailed to coc@atomberg.com

If a member notices any alarming behavior or could be a violation of the code or the law, they should report it immediately. This provides the company with an opportunity to address and resolve the problem, ideally before it becomes a legal, security, or reputational risk.

GOVERNANCE OF THE CODE

1. For the administration and governance of the code, the company has formed a committee known as the "Code of Conduct Committee" ("COC Committee").
2. The core team constitutes the COC. The COO shall nominate and replace members of the COC as needed.
3. The company has also established an Internal Committee (IC) to administer the POSH policy in order to provide a harassment-free workplace, including, but not limited to, the appointment of an investigation team to investigate sexual harassment accusations.

ROLES AND FUNCTIONS OF COC COMMITTEE

1. The principal role of the Code of Conduct Committee is administrating, implementing, and monitoring ongoing Code compliance.
2. Establishing, revising, and executing processes to ensure that complaints of improper activities are collected, examined promptly, processed or resolved appropriately, and kept.

3. Addressing/ resolving complaints or concerns raised under the code through the appropriate disciplinary process.
4. Establishing, revising when needed, and implementing processes that allow Members to make confidential or anonymous reports of Improper Activities and related concerns.
5. Ensure that the Members in charge of drafting and reviewing the company's statutory filings and other public disclosures are informed of any reports of Improper Activities regarding the company's accounting, auditing, or internal auditing controls or disclosure practices.
6. Convene periodic training programs/ seminars for all Members in all locations to educate them and keep them up to date on any new external developments, modifications, or changes relating to the Code / applicable Laws.
7. The COC Committee will provide its quarterly report to the core team, along with a description of all meetings held, all pending Code investigations, and final Code judgments, including disciplinary actions taken.
8. If COC Committee receives a complaint about sexual harassment or has grounds to think that there has been an occurrence of sexual harassment, it will immediately forward the complaint to the IC.
9. COC Committee shall promote an organizational culture that encourages law-abiding and ethical conduct.
10. COC Committee shall consider and resolve any issues of interpretation regarding any aspect of the ethics and compliance program.
11. COC Committee shall establish and communicate policies and procedures protecting members and others from retaliation for reporting suspected misconduct.

BROAD PRINCIPLES OF COC COMMITTEE

COC Committee will operate on the following principles:

1. Confidentiality,
2. Impartiality,
3. Promptness,
4. Sensitivity,
5. Courtesy and
6. Respect

REPORTING OF GRIEVANCES

1. The COC Committee will report to the Core Team directly.



2. The Chairperson of the COC Committee is responsible for submitting/filing such reports, forms, returns as the government may demand from time to time under any law currently in effect.

MODIFICATIONS OF THE CODE

1. This code and its procedures will be reviewed and updated on a regular basis by the COC Committee.
2. Any amendment to this code, or any decision to exempt any part of the code from application to any section of the company, must be approved by the Core Team and promptly disclosed and in applicable regulatory filings, along with details about the nature of the amendment or waiver, in accordance with applicable laws and regulations.
3. The COC Committee may make any clarifications to the code upon request from any member or on its own initiative. Such clarifications will bind the company and its members.
4. Unless the clarification states explicitly otherwise, all clarifications will apply prospectively and retrospectively.

MEETINGS OF THE COC COMMITTEE

1. The Code of Conduct Committee will meet as needed, but at least once every quarter, to assess and report on the quarter's topics and issues.
2. All meetings must be recorded within ten (10) days of the conclusion of the meeting.
3. The Chairperson of the Code of Conduct Committee will have access to the recorded hearings.
4. All inquiries, procedures, and records connected to any case or complaint shall be kept private.
5. The Chairperson of the Code of Conduct Committee will keep track of everything.
6. Such records will be accessible only to members of the COC Committee, the Core team, and no one else.
7. For any decisions addressing the selection of an investigative committee, the presentation of investigation findings, or the decision of any matter involving a Code violation, the presence of at least three members of the COC Committee will be considered valid.
8. Any member of the Code of Conduct Committee who misses three consecutive Code of Conduct meetings for no justifiable reason may be removed, and a replacement member may be selected by the remaining COC Committee members.

MAINTENANCE OF REPORTS, CASE FILES, AND RECORDS

1. All matters investigated under this code will be kept in a file and numbered sequentially.
2. Within 30 days of the case being decided, the Chairperson of the COC Committee will sign a formal closure report for each case.
3. The Chairperson shall physically file all case papers, investigation reports, and case closure reports.
4. The COO, Chairperson, and CPO will all have access to an electronic storage folder.
5. All cases under this code must have e-copies of the paperwork.
6. Only the following will have physical or electronic access to the copies:
 - i. Chairperson,
 - ii. COO, and
 - iii. CPO.

CONFIDENTIALITY

1. COC Committee will not distinguish between complaints/ issues made anonymously and those made with the identity of the complainant revealed.
2. Members may choose to remain anonymous while reporting any non-compliance, violation, or complaint to the COC Committee via any method. However, identification is recommended to expedite inquiry and communication.
3. If members reveal their identities, the committee and investigators will maintain their anonymity to conduct a thorough and unbiased investigation.
4. If a complaint is raised anonymously, an attempt will be made to obtain information from the anonymous complainant.
5. The COC Committee will not attempt to link the anonymous complainant's identity to any member.

INVESTIGATION PROCESS

All complaints that appear to be a prima facie instance of Code violation will be investigated. The company may conduct the inquiry in-house or hire outside investigators.

The COC Committee takes all reports of probable misbehavior/law/code violations. The COC Committee will conduct a secret investigation through an investigation panel, determine if the code or any law has been broken, and take appropriate corrective action.



Regardless of who gets it, all concerns about a Code breach will be addressed to the Chairperson of the COC Committee. It will be taken into consideration that the first person who receives the concern does not pass personal judgment on it.

When investigating the response to a complaint, the COC Committee will ensure that the following Natural Justice Principles are followed, which include:

- i. Both parties, including witnesses, must be given a reasonable opportunity to be heard and produce any additional relevant documents.
- ii. No one will be permitted to sit as a judge in their own case.
- iii. The ultimate judgment will be reached after thorough inquiry and proper reasoning.
- iv. The COC Committee's decision must be in writing and include the reasons for the decision.

Both parties (if the identity of the complaint is known) shall be informed of the COC Committee's decision after the investigation is completed.

There is no way to account for all possible scenarios in a set of rules. These standards may be modified as needed to comply with local law or contract requirements.

The COC Committee will need to assess any complaint or concern after receiving it:

- i) If the issue is unrelated to this code, it should be forwarded to the relevant authority that can resolve the problem, for instance, Issues about payroll, concerns about administration, and so forth.
- ii) If the issue is relevant to the Code of Conduct, the COC Committee's office will launch an investigation right away.

Constituting the investigation team

- COC Committee will form an appropriate investigation team, depending on the type of complaint received, within two weeks of receiving the complaint.
- COC Committee will not decide any matter without conducting a thorough investigation, except in some cases where the misconduct/ breach/ violation of the code or any law is obvious or the offender/ defendant confesses about such a violation.
- Depending on the type of complaint received by the COC Committee, the investigation team may vary.

DECISIONS BY COC COMMITTEE

1. Members of the COC Committee will decide on any Code violations.

2. The COC Committee's decision is final and binding on all members concerned in a given matter.
3. The COC Committee is required to justify its decision.
4. If there is any disagreement within the COC Committee about a decision, the majority decision will take precedence. There will be re-voting if there are an equal number of votes cast for and against a judgment.
5. If the re-voting yields an equal number of votes for and against the decision, the Chairman of the COC Committee will be given a casting vote.
6. Every quarter, the COC Committee will present its findings to the Core Team.

DISCIPLINARY ACTIONS

The COC Committee seeks to administer discipline that is appropriate for the nature, seriousness, and circumstances of each Code infraction. It employs a graduated discipline structure, with letters of reprimand being issued for less serious, first-time careless offenses. Violations of a more serious nature may result in a transfer, suspension without pay, loss or reduction of a merit raise, bonus, stock option award, or unpaid termination.

NO RETALIATION

The company has a firm policy of not retaliating against anyone who raises a legitimate complaint under this code. The company values members who follow this code and voice a concern or report misbehavior/violation. This code prohibits retaliation against a member or organization that raises an issue in good faith. Any adverse employment action, including separation, demotion, suspension, loss of benefits, threats, harassment, or discrimination, cannot be based on a member's honest raising of concern or participation in an investigation.

Allegations of retribution will be looked into, and appropriate action will be taken if necessary. Anyone found guilty of retaliating against people who report suspected misbehavior or other business hazards will face disciplinary action, up to and including dismissal.

If a person encounters or believes retribution against another member for filing a complaint or reporting an issue, the member should contact the COC Committee immediately. The company will protect any member who raises a concern honestly.

Atomberg will take appropriate measures if anyone, regardless of their status in Atomberg, retaliates against a complainant – even if it later turns out that the complainant was erroneous in reporting the situation.

FALSE ACCUSATIONS

Members do not have to be correct when they raise a concern in order to report it honestly; they simply have to feel that the information they are presenting is accurate. Making false accusations with the intent to deceive is a violation of this code that will be investigated.

ANNEXURE

CODE OF CONDUCT COMMITTEE (COC COMMITTEE)

Please share your grievance on coc@atomberg.com

Employee Code	Employee Name
1010	Arindam Paul
1008	Ankur Agarwal
1426	Hardik Bagrecha
1430	Nipun Agarwal
1582	Pushkin Kasat

INTERNAL COMMITTEE (POSH IC COMMITTEE) Prevention of Sexual Harassment

Please share your grievance on posh@atomberg.com

Location: 3rd Floor, Tower B, 247 Embassy Park, LBS Marg, Vikhroli West, Mumbai, Maharashtra, India, 400083

Employee Code	Name
1621	Anuja Pawar (Presiding Officer)
1870	Nishit S (Member)
1814	Ankita Roy (Member)
External	Devika Singh (Member)

Location: 1205, Millenium Business Park, MIDC Industrial Area, Sector 1, Kopar Khairane, Navi Mumbai, Maharashtra 400710

Employee Code	Name
1621	Anuja Pawar (Presiding Officer)
1664	Isha Bakre (Member)
1070	Utkarsh Gautam (Member)
1814	Ankita Roy (Member)
1224	Pragya Kumar (Member)
External	Sairekha Sureshkumar (Member)

Location: Atomberg Technologies, Mind Space Shelters LLP/Vithai Developers LLP, Gate No 51-59, Bhamboli, Chakan, Pune -410501

Employee Code	Name
1814	Ankita Roy (Presiding Officer)
1957	Srikanth Talagadadevi (Member)
1621	Anuja Pawar (Member)
2364	Bhavana Siyaram Yadav (Member)
2414	Manesh K (Member)
1658	Amol Amte (Member)
External	Sairekha Sureshkumar (Member)

Location: Atomberg Technologies, Phase 1, Hinjawadi Rajiv Gandhi Infotech Park, Hinjawadi, Pune, Pimpri-Chinchwad, Maharashtra 411057

Employee Code	Name
1702	Smriti Prasad (Presiding Officer)
1070	Utkarsh Gautam (Member)
1621	Anuja Pawar (Member)
1904	Yashika Kansal (Member)
1814	Ankita Roy (Member)
External	Devika Singh (Member)

Location: Atomberg Technologies, Building – A2, KSH Infra Park 3 Private Limited, Village: Varale, Taluka: Khed, Chakan, Pune, Maharashtra 410501

Employee Code	Name
1814	Ankita Roy (Presiding Officer)
1621	Anuja Pawar (Member)
1658	Anup Shinde (Member)
External	Sairekha Sureshkumar (Member)

Location: Atomberg Technologies, A1, 1st Floor, Hamilton House, above Starbucks, Block A, Connaught Place, New Delhi, Delhi 110001

Employee Code	Name
1814	Ankita Roy (Presiding Officer)
1621	Anuja Pawar (Member)
2103	Abhilash Sahoo (Member)
2248	Akash Singh (Member)
External	Sairekha Sureshkumar (Member)

Location: Atomberg Technologies Pvt. Ltd, Awfis Space Solutions Pvt Ltd. Godrej Waterside, 12th Floor, Tower 2, DP-5, DP Block, Sector V, Bidhannagar, Kolkata, West Bengal 700091

Employee Code	Name
1814	Ankita Roy (Presiding Officer)
1621	Anuja Pawar (Member)
2056	Kalpak Sarkar (Member)
2248	Akash Singh (Member)
External	Sairekha Sureshkumar (Member)

Location: Atomberg Technologies Private Limited, Isphani Center, 7th floor, One co-work, Cabin 5,6,7,123, 124, Nungambakkam High Rd, Thousand Lights West, Thousand Lights, Chennai, Tamil Nadu 600034

Employee Code	Name
1621	Anuja Pawar (Presiding Officer)
2234	Vijaykrishnan M (Member)
1886	Ayothiprabhu M (Member)
1814	Ankita Roy (Member)
External	Shivakami Ravichandran (Member)



ANNEXURE

WELFARE AND PROTECTION OF RIGHTS OF TRANSGENDER PERSONS AT THE WORKPLACE

Please share your grievance on coc@atomberg.com

Employee Code	Designated Complaints Officer
1430	Nipun Agarwal



ANNEXURE

SUMMARY OF ADDITIONS/CHANGES TO CoC

Sr. No	Summary of additions/changes to CoC	Date
1	Addition of complaints officer for transgender persons (section of grievance redressal mechanism, point 6) and updated list of core team members (Section of scope and purpose)	April,2023