



## EMPLOYEE CODE OF CONDUCT

### Objective

The objective of this policy spells out the conduct and discipline expected of employees to safeguard the Company's dignity, image and status and to ensure that the work environment is pleasant for all.

### Scope

This policy applies to all employees, contractors, sub-contractors, vendors, consultants associated with the Company

### Policy

- The priority of the employee of VBHC is to perform the duties and responsibilities assigned to him/her. It is employee's responsibility to comply with the Company's policies and procedures in all areas, including attendance, safe work practices and professional conduct at all times.
- The Company has established Rules of Prohibited Conduct to promote and preserve a safe, productive and pleasant work environment. These rules identify such conduct that will not be tolerated and are designed to ensure the successful operation of the company.

### Procedures

- Corrective counseling may be initiated if there is evidence of deterioration of performance, attendance, conduct, or disregard of a standard of behavior by a staff. However, corrective counseling is not a prerequisite to disciplinary action or involuntary termination of employment.
- The following are examples of prohibited conduct which may be cause for disciplinary action and, depending upon the severity, may warrant immediate involuntary termination at the company's sole discretion. This list is not all inclusive. Other situations that arise or occur may warrant disciplinary action up to and including termination.



### *Two Categories of Offence:*

The offence is primarily categorized into "Minor Offence" and "Major Offence", which are detailed below:

#### *Minor Offences*

Employees who commit offences under this category are subject to warning and if repeated, may be terminated. Offences that fall under this category are as listed below

- Failure to observe security, safety, hygiene and sanitation regulation.
- Failure to punch/clock in or out personally.
- Reporting late for work three times consecutively within three months.
- Smoking while on duty and inside the Company's premises of the office.
- Bringing unauthorized visitors or personnel into Company's restricted premises.
- Absent from place of work without approval or proper reason.
- Failure to comply with work schedules.
- Deliberate delay or failure to submit an official report.
- Failure to comply with any periodically scheduled examination or training required by the Company.
- Failure to follow proper dress or grooming code.
- Acts of discrimination against guest or fellow staff.
- Performing tasks and using Company tools and equipment without prior permission for personal purposes during/after working hours.
- Sleeping while on job or leaving the job without authorization.
- Changing schedule without supervisor's approval.
- Influencing other staff to disobey rules and regulations or Company and supervisor's orders.
- Uttering or writing unwarranted offensive remarks which may damage the integrity and reputation of a fellow staff and the Company.
- Unauthorized leave of absence even for one day without informing supervisor or Company representatives.
- Failing to notify supervisor or department heads when employee is late within the first hour of the scheduled work except in extenuating circumstances.
- Use of extended personal calls, messaging, internet browsing for personal motives, and other personal entertainment during office hours leaving behind and ignoring official duties.
- Making customers, vendors or any visitors of the Company to wait for more than 30 minutes without valid reasons.



### *Major Offences*

Employees who commit offences under this category are subject to dismissal. Offences that fall under this category are as listed below

- Providing means of entry for unauthorized personnel, that is, lending identity card or nametag to other people.
- Tampering of memos, correspondences, announcement, records and other Company files.
- Unauthorized leave of absence for three days without informing supervisors or company representatives.
- Impolite, rough or using offensive language to guests.
- Threatening or using humiliating words or slandering guests, threatening superiors or fellow workers.
- Embezzlement, manipulation and cheating.
- Causing deliberate damage to company property or property belonging to tenants/guests or any persons.
- Deliberate abuse of medical leave.
- Forging or altering time records or clocking in/out on behalf of other staff.
- Other misconduct that has led to imprisonment based on the local State laws.
- Gross carelessness in preserving the upkeep of the Company's assets or items belonging to other parties under the Company's name, which causes severe loss or damage to the Company's property including letters and valuable documents.
- Gross carelessness in carrying out duties, the result of which causes injury to guests or fellow staff.
- Possessing or carrying dangerous weapons, firearms, explosives, drugs, illegal items or publications banned by the government, within Company premises.
- Committing immoral conduct, acts of indecency, touting or soliciting for purposes of prostitution within Company premises.
- Falsifying or giving false information on company records including employment applications, medical records, security questionnaires, time cards or other company documents.
- Consumption of alcohol and illegal drugs during working hours.
- Prying into privacy of the property of guests or staff.
- Theft or attempt to theft of properties of guests or employees and not submitting items found to Admin Department.
- Fighting or instigating fights during working hours or within Company premises.
- Gambling or betting at Company premises during or after working hours.
- Starting or spreading baseless rumors about the Company or any of staff.
- Disclosing confidential information benefitting competitors or any external agency to the detriment of the Company.
- Negatively influencing business level and profitability by deliberately restricting or slowing down work.



- Found guilty of continued violation of Company regulation or policies and procedures after having received valid final warning letter.
- Making confidential personal transactions within Company premises or abuse of position held for personal gain.
- Acceptance of bribes or other favors in exchange for doing a job or deciding which involves the Company.
- Misrepresentation of the Company in external establishments, gatherings or contracts.
- Use of Company funds for unauthorized purposes.
- Insubordination such as refusal to follow specific instructions of supervisor as to cause a disruption of Company operations, disadvantage effect on Company performance, or damage to property.
- Issuing false statements or performing acts which determine and damage the Company's, or which may cause a conflict of interest on the part of the staff.
- Participation in any line of business which is in competition with that of the Company's, or which may cause a conflict of interest on the part of the staff.
- Obtaining or attempting to obtain Company supplies or equipment using fraudulent and/or falsified documents.
- To ask for tips/wages, present or any gifts in kinds from customers, contracts or suppliers.

#### **Process for implementing discipline (leading to dismissal)**

##### **Minor Offence**

First Minor Offence	:	Verbal warning
Second Minor Offence	:	Written warning (documented in personnel file)
Third Minor Offence	:	Disciplinary Inquiry comprising supervisor and Head of the Department and HR Department (documented in personnel file) OR final warning
Fourth Minor Offence	:	Dismissal (immediate action if found guilty) <ul style="list-style-type: none"><li>• Termination letter to be issued;</li><li>• No notice period required;</li><li>• No salary-in-lieu of notice period</li></ul>

##### **Major Offence**

Any major offence will result in the termination of employment of the employee with the company at the discretion of the Management.



## Corporate gifts and concessionary offers

### Objective

In the course of doing business, you may receive gifts and concessionary offers from customers, members of business community and business associates. Also, there may be occasions when you may have to purchase and present gifts to clients on behalf of the Company.

This policy sets out guidelines and procedures to:

- Provide suitable responses to the Customers;
- Protect and uphold reputation, professionalism and integrity of the Company and its staff; and
- Avoid corporate obligation to customers resulting from gifts received.

### Scope

This policy is applicable to all employees, Consultants, Contractors and Vendors or anyone directly or indirectly associated with VBHC

### Policy

#### *Definition*

- A client or customer refers to any external person being served.
- A business partner refers to existing and potential customers, vendors, contractors, partners, government officials and any other business associates.
- A gift is any item which may be in cash or in kind, perishable or non-perishable, which has commercial value.

#### *Solicitation of Gifts*

- Employees are strictly prohibited from soliciting gifts or seeking favors or preferential terms for their own personal benefit from any business partners with whom they have dealings in an official capacity.
- Employees must not solicit gifts or donations including advertisements for souvenir program for company functions from their business partners within the VBHC Group.

#### *Acceptance of Gifts*

- Employee shall not accept gifts of commercial value.
- Employees shall firmly decline such gifts of commercial value, however if it is impossible or impractical to refuse such a gift, they may formally accept it. Employees must report



without delay by communicating to HR and their immediate Supervisor of Gift Received and seek clearance from the following Approving Officer as follows:

Value of Gift	Approving Officer
Rs. 2000 and less per gift	Head of HR
More than Rs. 2000 per gift	COO

Employees need not declare gifts which are handed out as normal gestures of social courtesies, such as:

- Year-end calendars, memo pads, diaries and planners;
- Flowers;
- Mementos/souvenirs which have no commercial value;
- Perishable gifts of less than Rs.1000.

In case if an employee is/was offered any inducement or gratification, he/she shall report to the respective supervisor. Gifts should also be refused when:

- It is likely to result in unnecessary or undesirable; indirect or direct publicity of the Company;
- It is intended to exert influence on or is likely to embarrass the Company;
- The receipt of such gifts would place you under any form of obligation;
- A gift in the form of cash must be strictly refused.

#### *Declaration of Gifts Received*

- Employees must declare all gifts (except those handed out as normal gestures of social courtesies) received from business partners to HR and your immediate Supervisor by mail at the earlier possible time.
- All gifts received must be acknowledged immediately with a thankyou note or appreciation.
- Notwithstanding the above, it is not necessary to acknowledge the following:
  - Routine supply of periodicals, magazine and other publications including complimentary copies;
  - Trade samples
  - Mementos/souvenirs which have no commercial value.



## Procedure

- When a gift is offered to an employee, all attempts must be made to decline/return the gift to the donor. In cases where it may be discourteous or impractical to return the gift, then the employee must report and seek clearance from the Approving Officer for arriving at an appropriate decision.
- If Employees need to present a gift to business partner on behalf of the Company, employees are required to seek clearance from the Approving officer by email.

## Usage of Cell phone

While Company allows use of cell phones at work, it is expected that such devices will not distract self or other employees from their work or create disruption in the workplace. Employees are expected to follow a few simple rules that are listed (but not limited to) below:

- Use of cell phone in a manner that is beneficial at work and discharge duties efficiently and effectively. (Business calls, productivity apps, calendars.)
- Keep personal calls brief and use an empty meeting room or shared area to avoid inconveniences to fellow employees.
- Avoid playing games on your phone or texting excessively.
- While VBHC strictly discourages use of cell phone while driving, employees are expected to park their vehicle safely before making/answering calls. This will help personally and to carry out official duties while ensuring personal safety.
- Download or upload of inappropriate, illegal or obscene material using our corporate internet connection is strictly prohibited.

## Corporate email

Email is essential to our work. While Employee shall primarily use the official mail id for carrying out official communications, employee may use official mail id for personal use in unavoidable circumstances. Employees shall ensure that they comply with the company policies when official mail ids are used for personal communications. The usage of mail ids are listed below:

- Work-related use - Employees can use the corporate email for work-related purposes without limitations. For example, signing up for newsletters and online services that will help Employees in their job or professional growth.
- Personal use - Employees can use email for personal reasons as long as they keep it safe, and avoid spamming and disclosing confidential information. For example, sending emails to friends and family and download eBooks, guides and other safe content for personal use.



### Social media

Avoiding personal social media usage during office hours and within office network will help:

- Discipline yourself. Avoid getting sidetracked by social platforms.
- Ensure others know that the personal account or statements don't represent our company. For example, use a disclaimer such as "opinions are my own."
- Avoid sharing intellectual property or confidential information. Ask your manager before you share company news that's not officially announced.
- Avoid 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.

### Usage of Intellectual Property

- The Employees are required to acknowledge that they have been assigned to carry out certain work, and that their duties may include reviewing the products and services of the organization and any employed organization with a view to improving them and implementing such improvement.
- The Employees will assign to the organization all patents, copyrights, design rights, registered designs, trade and service marks(registered and unregistered) rights in confidential information and other intellectual property rights throughout the world for the full term of the rights concerned ("Intellectual property Rights") in any invention, discovery, improvement , design, machine, device, apparatus, composition, process, plan or program (whether in documentary or software form)created, made or conceived by them either solely or in collaboration with in the course of their employment (whether or not during normal working hours).
- The Employees will execute, acknowledge and deliver all documents and instruments request by the organization for such purpose, including assignments for vesting title in or the benefits of such Intellectual Property Rights to the Organization or its nominees.