



Girikon Solutions Private Limited

(Subsidiaries of Girikon, Inc)

(www.girikon.com)

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Employee Code of Conduct & Disciplinary Procedure

Document Version Control

Document Controller

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10 th March, 2018	Mr. Sanatan Dey, Operations Manager	1.1	First release, document has been created
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7 th April, 2026	Mr. Sanatan Dey, Director - Delivery & Compliance	1.9	Nineth release, Designation changes for Kalpana Singh

Reviewers

Name	Position	Role
Ms. Kalpana Singh	General Manager HR	Human Resource Security
Mr. Ravi Shanka Verma	IT Manager	IT Infrastructure
Mr. Shailendra Jha	Finance Manager	<i>Physical & Environment security & Security in supplier delivered services</i>
Mr. Yoginder Singh	Business Development- Head	<i>Information Security in Customer Relationship</i>
Mr. Awanish Shukla	Director - Solutions Architecture	<i>Project Management</i>
Ms. Rajni Sharma Nath	Director Delivery	<i>Software Development & Support</i>
Mr. Sanatan Dey	<i>Director - Delivery & Compliance</i>	<i>Incident Management & Business Continuity& Compliances & Project Management</i>
Mr. Ashok Anibha	CEO	<i>ISMS Policy, Risk management, Security organization & Compliances</i>

Approver(s)

Name	Position	Organization
Mr. Ashok Anibha	CEO	<i>Girikon, Inc Girikon Solutions Private Limited</i>

Authorized Users

S. No	Authorized users	Location
1	All Employees (Permanent, Probation & Contractual)	<i>India & US</i>

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Employee Conduct & Disciplinary Procedure

General policy

Rules of conduct for GSPL employees are intended to promote the orderly and efficient operation of the organization, as well as protect the rights of all employees. Violations, therefore, shall be regarded as cause for disciplinary action.

These rules are published for the employees' information and protection. Ignorance of work rules is not an acceptable excuse for violation. It is each employee's responsibility to know the rules and abide by them. These rules are not all-inclusive, and other departmental or Organization regulations may exist. Employees are expected to know and abide by these rules as well.

Rules of conduct for non-bargaining unit employees

Human Resources shall be consulted regarding the consistency of rule interpretation and appropriateness of the penalty being applied for violation of any of the following rules of conduct.

Section 1

For violation of any of the following rules, an employee shall be subject to penalties ranging from a formal written warning notice up to, and including, discharge.

- Neglect of duty.
- Insubordination or refusal to comply with employer's instructions, unless such instructions are injurious to the employee's safety and health.
- Conduct described below:
 1. Immoral or indecent conduct.
 2. Conviction of a felony.
 3. Conviction of a misdemeanor involving moral turpitude while an employee of the Organization.
- Intentional falsification of personnel records, payroll reports or other Organization records.
- Theft, intentional destruction, or defacing of Organization or employee property.
- Deliberate or careless conduct risking the safety of self or other employees.
- Consuming alcoholic beverages while on duty, except at approved Organization functions, or the possession or consumption of illegal drugs.
- Abusive, threatening, or coercive treatment of another employee, employee or member of the public.
- Reporting for work in an unsafe condition, which includes but is not limited to, being under the influence of alcoholic beverages or drugs. An employee who so reports shall be sent home with pay pending investigation.
- Knowingly admitting an unauthorized person or persons into any locked or restricted building or area of the campus.
- For other offenses of equal degree to the above.

When an employee engages in conduct in violation of the Section 1 rules and the conduct is committed off-duty and not on Organization property, the Organization may discipline the employee, up to and including discharge, whenever the conduct causes unfavourable publicity to the Organization, impairs the credibility of the employee to perform the employee's job or is otherwise connected to employment at the Organization. Conduct that is off duty but on Organization property or that is directed toward Organization employees, employees, representatives or property is always connected to employment at the Organization. Likewise, conduct that is on duty but off Organization property is always connected to employment at the Organization.

Section 2

For the commission of any of the following offenses, an employee shall be subject to disciplinary action up to and including discharge. Disciplinary action for the same or different offenses shall progress in the following manner:

1. **Verbal warning.** Verbal statement to employee that he/she has violated a rule and/or regulation and that such violation may not continue.
2. **Written warning.** Formal notification in writing to employee that he/she has violated a rule and/or regulation.
3. **Suspension.** Loss of work and wages for a specific number of hours or days, but not for more than one work week, depending on the severity of the offense. Notice of suspension is provided to the employee in writing.
4. **Discharge.** The employer/employee relationship is detached.

If an employee receives four warning notices for the same or different offenses within a period of 12 consecutive months, the employee shall, at the time of the issuance of the fourth such notice, be subject to discharge.

- Excessive absenteeism.
- Excessive tardiness.
- Inattentiveness to work, including but not limited to, failure to start work at the designated time, quitting work before proper time, or leaving assigned work area, building, or project during working hours without authorization from appropriate supervisor as a daily practice.
- Posting unauthorized materials on walls or bulletin boards; defacing or removing authorized material from bulletin boards.
- Violation of a safety rule or safety practice.
- Smoking in prohibited areas.
- Failure to report for work without giving the supervisor or department head notice of absence within two and half hours after the beginning of the scheduled workday.
- Vending, soliciting or collecting contributions on the Organization's time or premises without prior appropriate authorization from the Organization.
- Gambling, lottery, or any other game of chance on the employer's premises during working hours.
- Any other offense of equal degree to the above.

Confidential information

It is each employee's responsibility to become familiar with the provisions included in this policy.

The following policy governs the disclosure of confidential information held in any manner by employees of GSPL. The purpose of this policy is to protect and safeguard individual and Organization information used throughout the Organization.

1. For purposes of this policy, "confidential information" includes, but is not limited to:
 - Employee educational information and discipline records.
 - Non-public personal information, concerning employees and employees including, but not limited to, information system user identification numbers and passwords, internal communications, banking or financial information, medical and health information, disability status or special needs, insurance information, and personal benefits information.
 - Organization-related information which has not been publicly published or released with Organization authorization, including but not limited to budget, financial, negotiation, bidding and other information.
 - Organization research data, information and findings that are protected by law, contract or policy.
 - Information described as confidential under any other Organization policy, rule or directive.
 - Other information and records which the employee is directed under proper authority to not disclose. Confidential information does not include information publicly disclosed by the Organization or which is required to be disclosed pursuant to law or contract.
2. All Organization employees must hold any confidential information in trust and confidence, and not use or disclose it thereof, directly or indirectly, except as may be necessary in the performance of duties for the Organization or as otherwise required by law or contract.
3. Organization employees may not remove confidential information from a Organization department or office, or duplicate confidential information, unless authorized by the Organization to do so. Upon termination of any assignment or as directed by a supervisor, employees shall return all such materials and copies thereof to their proper location in the department or office.
4. All requests by external entities or persons for the disclosure of confidential Organization information should be promptly directed to the management of GSPL, unless the employee has received previous Organization authority to respond to such a request.
5. Questions regarding authorized disclosure or use under this policy should be directed to the Organization employee's supervisor prior to disclosure or use.
6. Organization employees who violate this policy will be subject to legal action, including but not limited to disciplinary action up to and including termination of their employment or contractual relationship.

Employment of relatives (favouritism)

Relatives may be employed if they meet regular employment standards. However, staff members may not participate in or otherwise influence Organization decisions which involve members of their
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own families. This includes hiring, promotion, retention, leaves, pay changes, etc. The policy on sexual relations also requires that married couples not work in positions where one has direct influence over the other.

Outside employment

Full-time employees are expected to devote their workday efforts to the job for which they were hired. Thus, some restrictions have been placed on outside employment and the pay received for that work. Policy for this varies with each employee group. For details on what rules apply to you, contact your supervisor or Human Resources.

Workplace threats, violence, and weapons

The Organization is committed to the safety and security of all persons. To ensure a safe workplace and to reduce the risk of violence, all employees should review and understand all provisions of this workplace threats, violence and weapons policy.

Threats and violence

The Organization will not tolerate any threats, threatening behaviour, or acts of violence committed by or against employees or on Organization property. Violations of this policy will lead to disciplinary action up to and including dismissal, as well as arrest and prosecution for any criminal acts.

Prohibited conduct.

Employees are prohibited from making threats or engaging in violent activities. This list of behaviours, while not inclusive, provides examples of conduct that is prohibited.

- Causing physical injury to another person.
- Making threats of any kind.
- Aggressive, hostile or violent behaviour, such as fear of others; attempts to instil fear in others; or subjecting others to emotional distress.
- Other behaviour which suggests a propensity toward violence, which may include aggressive speech, excessive arguing or swearing, damage or threats to damage Organization property, or a demonstrated pattern of refusing to follow Organization policies and procedures.
- Intentionally damaging Organization property or property of another employee, employee or member of the public.
- Possession of a weapon while on Organization property or while on Organization business, with the exceptions indicated in the weapons policy.
- Committing acts motivated by, or related to, sexual harassment or domestic violence.

Dealing with conflict

Employees who confront or encounter an armed or dangerous person should not attempt to challenge or disarm the individual. Employees should remain calm, make constant eye contact, and talk to the individual. If a supervisor can be safely notified of the need for assistance without

endangering the safety of the employee or others, such notice should be given. Otherwise, cooperate and follow the instructions given.

Reporting

Organization employees **are responsible to notify** the HR Department of any threats they have witnessed or received, or any behaviour they have witnessed which they regard as threatening or violent, when the threat or behaviour is job-related, or might be carried out on Organization property, or is connected to Organization employment.

- Reports can be made anonymously, and all reported incidents will be investigated.
- Reports or incidents warranting confidentiality will be handled appropriately and information will be disclosed to others only on a need-to-know basis.

Enforcement and discipline

Upon notification to the HR Department, the person making threats, exhibiting threatening conduct, or committing any other acts of aggression or violence on Organization property shall be removed from Organization property as quickly as safety permits and shall remain off Organization property pending investigation. Any employee determined to have committed such acts will be subject to disciplinary action, up to and including termination and/or criminal prosecution. Non-employees engaged in violent acts on Organization property will be reported to the proper authorities and fully prosecuted.

Drug-free workplace.

The Organization prohibits the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in the workplace. All employees must abide by the terms of this drug-free workplace policy. Employees violating such prohibition will be subject to disciplinary action, up to and including discharge.

The term "controlled substance" refers to all illegal drugs and to legal drugs used without a physician's order. It does not prohibit taking prescription medication under the direction of a physician.

Gifts

The Organization discourages employees from accepting gifts from individuals or firms doing business with the Organization. Therefore, no employee shall solicit, accept, or agree to accept anything of value under circumstances which could reasonably be expected to influence the manner in which the employee performs work or makes decisions.