



SEHAJ SYNERGY TECHNOLOGIES PRIVATE LIMITED

CODE OF BUSINESS PRACTICES

**3rd Floor, Plot No. J 9/J 7/3, Opp. JVVNL Office, Bhagwan Marg Road, Swej Farm,
New Sanganer Road, Jaipur, RJ 302019**

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Ramish Verma
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SEHAJ SYNERGY TECHNOLOGIES PRIVATE LIMITED



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Ramkrishna
Auth.
Signatory

CODE OF BUSINESS PRACTICES

1. INTRODUCTION

- 1.1. Sehaj Synergy Technologies Private Limited (the “**Company**”) upholds the highest standards of integrity and professionalism in its operations and business dealings. The Company is committed to conducting its business in accordance with applicable laws and regulations and the highest ethical principles.
- 1.2. This Code of Business Practices (“**Code**”) applies to all personnel of the Company, including officers, directors, employees, contractors and any other person acting on behalf of the Company (“**Personnel**”). The principles as set out in this document describe how Personnel of the Company should conduct themselves. This Code does not cover every aspect in relation to a Personnel’s conduct. However, the Personnel should, and the Company shall, at all times, strive to conduct itself in a fair manner and shall always comply with the highest standards of industrial professionalism.

2. MATTERS COVERED

This Code contains standards and conduct to be followed relating to the following matters:

- (i) Anti-corruption and anti-bribery;
- (ii) Equal opportunity and anti- discrimination;
- (iii) Anti-money laundering;
- (iv) Data privacy and confidentiality;
- (v) Conflicts of interest;
- (vi) Protection and proper use of Company’s assets;
- (vii) Health and safety; and
- (viii) Reporting of complaints.

3. ANTI-CORRUPTION AND ANTI-BRIBERY

- 3.1. The Company is committed to fighting corruption and bribery in whatever way it can. The Company has a strict no-tolerance approach towards the offer and receipt of any bribe. In this regard, the Company has, adopted the Anti- Corruption and Anti- Bribery Policy, which can be accessed by the Personnel at www.sstpl.in
- 3.2. If a Personnel wishes to make a complaint against violation of the Anti- Corruption and the Anti-Bribery Policy of the Company, the Personnel may approach the Company Compliance Officer and/or the Committee, as per the procedure laid down in this Code.

4. EQUAL OPPORTUNITY AND ANTI DISCRIMINATION

- 4.1 The Company is committed to promoting equal opportunities in all facets of employment, and ensuring that all Personnel are treated equally, provided with equal opportunities, and not discriminating on the grounds of gender, race, color, disability, sexual orientation, religion, origin or nationality. In order to uphold these values, the Company has adopted an Equal Opportunity and Anti- Discrimination Policy. A copy of the Equal Opportunity and Anti- Discrimination Policy adopted by the Company can be accessed at www.sstpl.in
- 4.2 If a Personnel wishes to make a complaint against violation of the Equal Opportunity and Anti- Discrimination Policy of the Company, the Personnel may approach the Company Compliance Officer and/or the Committee, as per the procedure laid down in this Code.

5. ANTI-MONEY LAUNDERING

- 5.1. The Company is committed to ensuring that it is in compliance with applicable anti-money laundering laws. The Company or its Personnel shall not commit any action which might be construed as an offence of money laundering, including directly or indirectly attempting to indulge, or knowingly assisting or knowingly being a party, or being actually involved in any process or activity connected with proceeds of crime including its concealment, possession, acquisition or use.
- 5.2 Towards this objective, the Company and the Personnel must conduct business only with reputable customers who are involved in legitimate business activities and whose funds are derived from legitimate sources.
- 5.3 The Code aims to prevent any involvement by the Company in money laundering activity even where the involvement may be unintentional. It requires all Personnel to recognize questionable financial transactions, and to take steps to conduct appropriate additional due diligence. Appropriate measures must be set up to ensure that the Company and/or the Personnel do not, even inadvertently, accept forms of payment that are known or suspected to be means of laundering money. One such measure is in implementing risk-based “Know-Your-Customer” (“KYC”) due diligence procedures calibrated to the risk in question, as well as systemic ‘Red Flags’ to detect unacceptable or suspicious forms of payment. A Personnel failing to detect customer relationships and transactions that place the Company at risk, could cause irreparable harm to the Company’s reputation, leading to significant financial loss and severe penalties under applicable law.
- 5.4 If any Personnel detects any ‘Red Flag’, which in his reasonable opinion may result in money laundering, such Personnel must promptly contact the Company Compliance Officer (*as defined below*) and/or the Committee (*as defined below*) to facilitate any further due diligence or action that may be needed. The Company is also committed to



cooperate with law enforcement and regulatory agencies enforcing anti-money laundering laws and regulations.

- 5.5 This section on anti-money laundering constitutes a minimum standard. It must be complied with in any country in which the Company does business even when this Code is stricter than the anti-money laundering laws that are applicable in that country, including both applicable local laws and those laws with extra-territorial application. However, when applicable anti-money laundering laws are stricter than this Code, such laws must be complied with. In case of any doubts, Personnel must contact the Company's Compliance Officer via mail on hr@sstpl.net.in or 3rd Floor, Plot No. J 9/J 7/3, Opp. JVVNL Office, Bhagwan Marg Road, Swej Farm, New Sanganer Road, Jaipur, RJ 302019 .

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- 5.6 The guidelines set out in this section should be read in conjunction with the (i) Whistle blower Policy, which can be accessed at www.sstpl.in ; (ii) Anti- Bribery and Anti-Corruption Policy, which can be accessed at www.sstpl.in ; and (iii) any guidance published pursuant to this section of the Code.

6. DATA PRIVACY AND CONFIDENTIALITY

- 6.2. The Company is committed to protecting any personal data that it collects in the course of its business operations as well as preserving the integrity of any confidential information that it receives. The Company collects personal data in connection with employment of the Personnel as well as in the course of its operations. Such personal data shall be processed in accordance with principles as provided under applicable laws. The Company has adequate and appropriate standards in place for handling data and have formulated a Data Protection Policy, which and can be accessed at www.sstpl.in
- 6.3. The Company maintains the integrity of all confidential information that it handles. The Company and Personnel shall observe appropriate standards to protect the confidential information, including restricting of disclosure of such information to only such persons as required for the relevant purpose. Further, the Personnel may come into contact with confidential information relating to the Company during the course of their engagement with the Company. The Personnel shall treat such information as confidential and shall use such information only for the purposes as contemplated by disclosure of the information to the Personnel. The Personnel shall not use confidential information for personal gain.

7. CONFLICTS OF INTEREST

- 7.1. The Personnel shall, during the term of their employment with the Company, devote their time and efforts to performing their duties for the Company. Except as for the contractors or consultants whose relationships are governed as per the terms of their engagement





with the Company, the Personnel shall not accept another employment while they are engaged with the Company. The Personnel shall put the interests of the Company first, and shall not do any acts which may be harmful to the Company or its reputation.

- 7.2. If, in the course of any business dealings on behalf of the Company, the Personnel has any conflict of interest, personal or otherwise, the Personnel shall disclose such conflict of interest, immediately to the Company. Such Personnel, with a belief that they may have a conflict of interest should consult with the Company Compliance Officer who shall determine the course of action, if any, to be taken, in relation to such conflict.

8. PROTECTION AND PROPER USE OF COMPANY'S ASSETS

- 8.1. There may be various equipment and assets of the Company located at the Company's premises or elsewhere. There may also be intangible property or intellectual property of the Company that the Personnel come into contact with. The Personnel have a responsibility to ensure that the Company's property is used responsibly.
- 8.2. The Personnel shall safeguard and make proper and efficient use of the Company's property. Any situations or incidents that could lead to theft, damage or waste of the Company's property should be reported immediately to the Company Compliance Officer.

9. HEALTH AND SAFETY

- 9.1. The Company observes the required standards of health and safety, as required under the applicable laws. The Personnel shall adhere to all instructions or advisories that the Company or his/her supervisors have issued in respect of any health or safety standard to be followed.
- 9.2. The Personnel shall solely be responsible for any damage caused to her/ him as a result of non-compliance with standards that have been issued by the Company. If any health or safety violation or threatened violation comes to the attention of any Personnel, she/ he shall immediately report such violation to the Company Compliance Officer. The Personnel may also refer to the detailed procedure as set out in the Health and Safety Policy as formulated by the Company, which can be accessed at www.sstpl.in

10. REPORTING OF CONCERNS

- 10.1. The Company is committed to ensuring that its employees have a forum for voicing any grievances that they may have, and to take suitable measures in respect of such grievances.
- 10.2. The Company shall designate a senior employee from its management who can be appointed as the Company Compliance Officer. The Company has appointed Mrs. Anubhuti Vinod as the initial Company Compliance Officer. In case of any change in the person so appointed, the Company shall immediately notify the employees of the Company of such change.
- 10.3 In the event the aggrieved employee is comfortable resolving the issue directly with the concerned person, the aggrieved employee may approach the Company Compliance

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Officer to make a complaint. The Company Compliance Officer will then take the necessary action against the person. The aggrieved employee may, with the assistance and in the presence of the Company Compliance Officer, directly interact with the person informing them that this conduct is not encouraged. This remedy can be used when the nature of the grievance is not serious, and the aggrieved employee believes that it is appropriate that such process should be used to resolve the complaint. In the event the complaint is against the Company Compliance officer, the Personnel may approach the Committee (*as defined below*) directly.

- 10.4 The Company shall constitute a Grievance Redressal Committee (“**Committee**”) for dealing with any official complaints under this Policy, which have been either directly received from the aggrieved employee or referred to the Committee by the Company Compliance Officer. The Committee may also *suo-moto* take up any matter which it reasonably believes to be against the values set out in this Code. The Committee shall always include a senior employee from the human resources department. The initial members of the Committee shall be as follows:

NAME	DESIGNATION
Mr. Mohit Jain	Director
Ramesh Verma	Director
Vinod Jangid	Director
Anubhuti Vinod	Compliance Officer

- 10.5 For handling the investigation as well as the resolution of any official complaint under this Policy, the Company shall also engage an independent third party having relevant expertise in the field to form part of the Committee.
- 10.6 If the complaint of an aggrieved employee is of a serious nature or an informal remedy as contemplated in paragraph 10.3 above, is not appropriate, or if the aggrieved employee so desires, he/she may address the complaint to the Committee, with the option of marking the person against whom the complaint is made. Such complaint should be in writing and should contain in reasonable detail, where possible:
- the name of the alleged perpetrator(s);
 - a description of the action(s) being complained against;
 - any particulars of the action(s) regarding date, time and place of incident(s); and;
 - whether there were any witnesses to the incident(s).

Ramesh Verma



If a complaint is made against any member of the Committee, the other Committee members shall mutually decide to appoint another person to replace such person on the Committee.

- 10.7 Upon receipt of a complaint, the Committee will take immediate action, including to investigate the complaint. The Committee will carry out an independent investigation into the complaint to determine the merits of the complaint.
- 10.8 The Committee will carry out a thorough investigation maintaining utmost confidentiality. All investigation proceedings, including the nature of the complaint, parties involved, evidence collected and any documents prepared by the members of the Committee will be confidential, and any other employees involved in the investigation are expected to maintain confidentiality. In this regard, either the Company and/or the Committee may require any and all employees involved in the complaint to sign a non- disclosure term for upholding confidentiality.
- 10.9 The Committee may call for witnesses in relation to the investigation. If any employee is not comfortable with being a witness, the investigation panel may take the statements of such employee, in private and in writing.
- 10.10 The Committee shall conduct the investigation and strive to dispose of the complaint within a period of 45 (forty five) days from the date of receipt of such complaint by the Committee, provided that the Committee may recommend any interim measures to be taken by the Company until the complaint has been resolved.
- 10.11 After concluding the investigation, the Committee will prepare a report and will detail its findings on whether the complaint has merit, and penalties imposed, if any, if it has found that the complainant's case is true. The severity of the penalty may vary from tendering an unconditional apology from the respondent along with other measures as determined by the Committee, to termination of the services of such employee. There shall be no further appeal process after this.
- 10.12 The board of directors has the responsibility to act upon the findings of the Committee, and shall do so within a period of 30 (thirty) days from the date of preparation of the findings report by the Committee.
- 10.13 No employee who brings a complaint in good faith will suffer victimization. However, if the complaint is untrue and has been brought in bad faith, disciplinary action will be taken against such employee.

11. VIOLATION OF THIS CODE

The Company treats any violation of this Code stringently, and may take suitable action for any violation. If any Personnel violates any provision of this Code, in addition to any other right that the Company may exercise, the Company shall be entitled to take disciplinary action against the individual, which may range from such individual



tendering an unconditional apology to termination of his/her employment, depending on the severity of the violation. It will be the Company's sole discretion to determine the course of action in such an instance. If any Personnel is unsure of what to do in any situation, she/ he should approach the Company Compliance Officer before taking any action.

12. CONFIDENTIALITY

Any complaint or grievance made hereunder or any information disclosed in connection therewith shall be treated as confidential. The Company shall not, and shall require the Committee and the Company Compliance Officer who have received any complaint or grievance, to not disclose such information to any third persons. In this regard, either the Company and/or the Committee/Company Compliance Officer may require any and all employees involved in the complaint to sign a non- disclosure term for upholding confidentiality.

13. REVIEW AND AMENDMENT

This Code shall be subject to periodic review, in accordance with applicable laws. Any amendments to this Code shall be in writing and effective upon a resolution being passed by the board of directors of the Company approving such amendments. Brief details of each amendment shall be recorded in the format below:

Date	Version	Description of Amendments

Ramish Kumar