

eClerx




ENVIRONMENTAL, SOCIAL AND GOVERNANCE

Ethics

Policy





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| Project | eClerx Ethics Policy |
| Company | eClerx Services Ltd. |
| Prepared by | Pratik Bhanushali |

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| Document Title: eClerx Ethics Policy |  ENVIRONMENTAL SOCIAL GOVERNANCE | eClerx |
| Template Version: 1.0 | | |
| Policy Adoption Date: November 08, 2023 | | |

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1. Introduction

At the core of eClerx’s business, we help organizations work smarter, not harder. eClerx was founded in 2000 with the goal of transitioning, managing, and transforming complex business processes. Created from humble beginnings in a small office in Mumbai, today eClerx employs 16,000+ people across 12 countries globally. Clients benefit from our operational and domain expertise that helps them improve operational efficiency, productivity, efficiency, speed, and quality. The industries we serve include financial services, cable and telecommunications, retail, fashion, media and entertainment, manufacturing etc. Our customizable services and solutions optimize the way companies conduct business by streamlining the processes and improving business performance – while keeping costs down.

At eClerx, we always strive to adopt the best governance practices, and our management upholds the principles of Accountability, Fairness, Transparency and Responsibility. Corporate governance at eClerx reflects the Company’s compliance philosophy, strategies, relationship with stakeholders, commitment to values and ethical business behavior. Each employee is responsible for adhering to eClerx’s core values – Excellence, People, Integrity and Client, and we uphold strict ethical standards to encourage dedicated and trustworthy forms of behavior at the company. We have robust policies across the board to comply with the laws of the land in spirit. This document describes our ethics policy for the organization.

2. Scope of Application

This document dedicated to ethics is applicable to all employees (full-time, part-time and contract) of eClerx Services Limited and all its Subsidiaries and associates.

3. Our Commitment



Our company abides by the commitments made with respect to the following topics:

3.1. Corruption

eClerx recognizes that it is essential to fight corruption to continually have a competitive advantage in the market through superior services and experience. We are on a continuous path to rectify any chances of potential or actual corruption with protocols and standards against it. We ensure that anti-corruption due diligence programs are in place and corruption risk assessments are performed. In addition, we also implement careful control procedures such as sensitive gift and travel expense approval to prevent corruption and bribery. Our whistleblower policy encourages all employees to report against the violation of any of the corruptions procedures and ensures anonymity to protect their identity.

Targets:

- To employ an uncompromising stance against corruption and bribery in order to ensure zero such instances in the organization.
- To conduct corruption risk assessments annually from financial year 2026 and beyond.
- To ensure 98% employees are trained on anti-corruption and anti-bribery concepts, systems, procedures and policies by financial year 2025.
- To ensure all our operations are equipped with a certified anti-corruption management system by financial year 2026.

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3.2. Data Control and Management

Violation of data control and security of sensitive information proves to be one of the most important factors that determine the success of businesses, especially for eClerx. And thus to adhere to data control requirements and safeguard the client and eClerx information, we have certified our all delivery centers with ISO 27001 standard (Information Security Management System). We conduct proper risk management system to analyse our information security risk and implement comprehensive security controls to prevent unauthorized access to our clients' data, which consist of active monitoring mechanism of corporate infrastructure and communications systems, as well as strong firewall network setting and reporting framework. We are transparent about the processes of collecting-analysing-storing of sensitive data from customer/clients and have a records retention schedule in place. In addition, we conduct awareness training for all employees to prevent information security breaches and encourage our employees to report any concerns or violations that they come across.

Targets:

- To maintain zero external information security incidents in future.
- To sensitize 100% of our employees on the whistleblowing procedure to report any breach of data control and management by financial year 2025.

3.3. Fraud



Frauds, especially financial cases, occurring within an organization or with a third party by the organization will ultimately impact the revenue of the business. eClerx does not intentionally deceive someone to gain an unfair or illegal advantage. Our endeavor towards anti-fraud practices clearly calls out the responsibility of all employees to prevent and detect fraud, as well as report them through the whistleblower procedure. In the case of an untoward incident, a security incident report (SIRT) is shared with the steering committee and HR for their review and to decide upon further disciplinary action as per policy. In case of any fraud related to client data, these incidents will be communicated to the client as per contractual requirement or within 24 hours of the occurrence of incident.

3.4. Money Laundering

eClerx does not indulge in and discourages concealing the origin, ownership or destination of illegally or dishonestly obtained money by hiding it within legitimate economic activities to make them appear legal. Channels for financial transactions are regularly audited, and all staff members are encouraged to report any money laundering activity that may have come to their notice. If caught in the act of money laundering, violators will be prosecuted as dictated by local and global law.

3.5. Conflict of Interest

The firm encourages employees to not put themselves in a position where they might have to choose between their professional roles and duties and their personal interests. Any employee found in a situation where there is a conflict of interest will be subject to internal investigation or any other action thought necessary by eClerx. Conflict of interest includes (but is not limited to) sharing sensitive information with competitors, influencing the decision making process of the entity with whom the transaction is proposed or joining a competitor organization and using eClerx's expertise and practices there.

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3.6. Anti-competitive practices

eClerx strongly advises its employees to comply with competition laws in the jurisdiction that they are working in and avoid getting involved in practices such as in price fixing, and the usage of confidential data from competitors to unfairly solicit business to the company.

Targets:

- To ensure that 100% employees are sensitized with respect to Code of Conduct which includes ethical business practice including fraud, money laundering, conflict of interest, and anti-competitive practice issues by financial year 2025

4. Responsibilities

The management and all employees of eClerx are responsible for abiding by this policy document. They are also obligated to ensure that the policy is enforced uniformly and the information regarding the same is easily available to all full-time, part-time and contractual employees.

- Management – To enforce the policy document upon the organization and all staff members.
- Employees – To adhere to this policy and execute it.

5. Review



Periodic review about the extent to which this policy document is being enforced and followed by the organization, its various functions as well as all business units will be conducted by the senior management of the organization. The date of the last review conducted and the upcoming review to be conducted should be noted in the below format for the purpose of record keeping and ensuring transparency in the review system. Such noting shall be done through an annexure to this policy.

| Date of last review | Date of next review |
|---------------------|---------------------|
| - | - |

6. Communication

eClerx will rely on the following channels of communication to disseminate information about this policy:

- During onboarding of employees, the policy document will be shared with the new employees
- Any significant development with regard to the policies will be shared via email with all employees of eClerx
- Annual reminder to all employees about the organization’s commitment to the environment and this policy document

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7. Sanctions

Non-compliance of this Policy is frowned upon by the organization. Full-time, part-time, contractual employees and especially the senior management will be responsible for identifying the areas of negligence and any assistance from the employees is encouraged.

We encourage our employees to report any suspected violations of this policy by writing to **Chairman.AC@eClerx.com**, or writing to the following address: **eClerx Services Limited Sonawala Building, 1st Floor, 29 Bank Street, Fort, Mumbai - 400 023**. The confidentiality and anonymity of all employees reporting any suspected neglect of this policy will be protected by the company. There will also be no retaliation against any employees who report instances of non-compliance.

Kapil Jain
 Managing Director and Group CEO
 November 08, 2023

Acknowledgement

I, _____ (employee name), have reviewed and understand eClerx’s Ethics Policy, which includes the above sections on corruption, data control and management, fraud, money laundering, conflict of interest, and anti-competitive practice. I declare that I will adhere to the details as stated in this policy, the failure of which may result in appropriate disciplinary actions which include dismissal from the company.

[NAME]

[TITLE]

[DATE]

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ANNEXURE

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| Date of last review | Date of next review |
| - | October 2024 |

Revision History

| Date | Description of the Change | Updated by | Approved by | Document version |
|------------------|---------------------------|-------------------|---------------------|------------------|
| October 01, 2023 | Document created | Pratik Bhanushali | Srinivasan Nadadhur | 1.0 |
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