



CODE OF CONDUCT FOR EMPLOYEES

Foreword by MD/Chairman

Dear Employee,

Welcome to Shellinfo Global Digital Technologies Pvt. Ltd. Code of Conduct. This is our guide to doing the right thing in business. It is a must-read and a must-follow for all of us.

We are a global team and committed to delivering excellence to our employees and customers. In our code of conduct, we are focused on the most important principles and expectations rather than specifying detailed rules. It does not specifically address every potential form of unacceptable conduct, but, I believe that we are fully capable of making the right decisions when faced with difficult choices and we will be guided by our good judgment.

Our main objective is to provide a work environment that is conducive to both personal and professional growth. You will find the welcome gifts along with the onboarding plan and the employee policy in your welcome kit which you should read and understand. These policies will guide your career here and will make you aware of what makes Shellinfo Global as Shellinfo Global. As you are now part of the team, we are excited to see how the policies will shape your professional career. You should always comply with the policies during your employment at SHELLINFO GLOBAL. Circumstances will obviously be required when the policies, practices and benefits described need to change from time to time, which will be done and will be communicated to you.

Now, we would encourage you to reach out to your new team members and reporting manager. Feel free to discuss with us any questions you may have about your employment at SHELLINFO GLOBAL. We hope that your experience here will be challenging, enjoyable, and rewarding.

Our Values and Behaviours are the foundation for our Code. They define how each of us must act to ensure that SHELLINFO GLOBAL sustains its reputation and continues to earn the trust that allows us to prosper as a Company. As you read this Code, be guided by its expectations and continue to live out our values in your work every day.

Let's hit the ground running!

MURALI KRISHNA CHAPPALLI
CMD

INTRODUCTION

As an employee, it is important that you know what personal conduct is expected of you while on the job. In most instances, your own good judgment will tell you what the right thing to do is. In addition to complying with Company policies and job specific requirements, you are also expected to obey the rules and regulations of Shellinfo Global and this Code of Conduct (“Code” or “Policy”).

1. DEFINITION

A **CODE OF CONDUCT** is a set of values, rules, standards, and principles outlining what employers expect from staff within an organization. Organisations code of conduct serves as a valuable resource to help employees and others make informed, ethical decisions based on guiding principles. It is a vital part of a company’s compliance and legal policies.

We promote freedom of expression and open communication. But we expect all employees to follow our Code of Conduct. They should avoid offending, participating in serious disputes, and disrupting our workplace. We also expect them to foster a well-organized, respectful, and collaborative environment.

2. SCOPE AND PURPOSE OF THIS CODE

Adopting the code of conduct, the organization aims to make a commitment to self-regulation. The organization is putting into writing the conduct they expect from their employees and the ethical principles they want to guide them. It also outlines how employees should behave to reflect the organization’s wider mission and defines fixed regulations related to internal practices such as dress code or break policy. It emphasizes ethical attitudes and staff communication policies to prevent conflict or harassment while also outlining the consequences for poor behaving that violates the code.

By creating a code of conduct:

- The staff understands what rules and expectations management has. It defines how to act while at work, how to communicate both internally and externally, and helps employees be successful at the company.
- The organization has concrete company policies to help compliance.
- Potential customers and business partners understand the values of the organization.

Showcasing the ethics and principles an organization stands for will only help in creating an accurate and honest code of conduct that reflects the organization’s beliefs is a great starting point to let customers know who they are supporting with their business.

No code of conduct can cover every possible situation, the organization relies on all the employees to use good judgment and to speak up when they have questions or concerns.

3. ORGANIZATIONAL VALUES

- I. **INTEGRITY:** Integrity is the cornerstone of the Company. Shellinfo Global expects all employees to uphold honesty and transparency in every interaction, whether with customers, suppliers, service providers, or community members. The Company’s conduct is not only fair and ethical but also open to public scrutiny. Shellinfo Global believes that integrity fosters trust, which is essential for long term relationships and business success.
- II. **PEOPLE & RESPONSIBILITY:** The Company is dedicated to integrating environmental and social principles into its business practices, ensuring that its success benefits the communities it serves. At Shellinfo Global, the Company prioritizes the health and safety of its employees, customers, suppliers,

and service providers. The Company's commitment to social responsibility means that it actively works to give back to the community, creating a positive impact that multiplies over time.

III. **LEADERSHIP:** Leadership at Shellinfo Global is about teamwork, mutual respect, and accountability. The Company believes in treating all stakeholders—employees, customers, and suppliers—with fairness and honesty. Shellinfo Global's approach to leadership is characterised by integrity, humility, and a steadfast commitment to building strong community relationships. By embodying these qualities, Shellinfo Global not only distinguishes itself from its peers but also drives meaningful change in the communities it engages.

IV. **SERVICE:** The Company's goal is to deliver exceptional value to its customers through unparalleled service. The Company strives to meet and exceed customer expectations by delivering on its promises with precision and excellence. At Shellinfo Global, customer service is paramount; the Company is committed to being flexible and responsive to the unique needs of each customer, regardless of their size or market. The Company's dedication to service excellence ensures that every customer receives its best effort in terms of quality and support.

4. PRACTICES THAT ARE FOLLOWED BY THE ORGANIZATION

i. GENDER EQUALITY AND FAIR EMPLOYMENT:

Equal opportunity is a matter of fairness, respect and dignity. We value the unique contribution that each person:

- a. Treat everyone with respect.
- b. Be respectful of cultural differences not on race, colour, national origin, religion, caste, gender, age, sexual orientation, gender identity or expression, marital status, medical condition, disability, or any other characteristics or status that is legally protected.
- c. Offensive messages, derogatory remarks and inappropriate jokes are never acceptable.
- d. Being in full compliance with the laws, rules and regulations related to Fair Employment Practices in letter and spirit.
- e. We are committed to following fair employment practices that provide equal opportunities to all employees. We do not discriminate or allow harassment based on race, colour, religion, disability, gender, national origin, sexual orientation, gender identity, gender expression, age, genetic information, military status, or any other legally protected status. At Shellinfo Global, we value diversity and believe that a diverse workplace builds a competitive advantage.

ii. SEXUAL HARASSMENT AT WORKPLACE:

To work effectively, all of us need a healthy and safe work environment. All forms of substance abuse as well as the use or distribution of drugs and alcohol while at work is prohibited. Unless required as part of your role (for instance for security personnel were deemed necessary), possession and/or use of weapons/firearms or ammunition while on business of the Company is prohibited. All of us should be safe at our place of work.

To put these values in practice, all of us must ensure that decisions affecting employees are based on business factors only. For instance, decisions regarding hiring, promotion, termination, transfer, leave of absence or compensation should only be based on relevant business factors.

Provide a workplace that is free from harassment and intimidation. We do not tolerate any form of abuse or harassment. Inappropriate comments of a sexual nature or any other sexually offensive behaviour will not be tolerated.

Help create a work environment free of all forms of harassment.

5. PROTECTING PERSONAL INFORMATION:

We respect our employee's privacy and will only take an interest in what you do outside of work if it affects the organizations reputation or legitimate business interests.

iii. ANTI-CORRUPTION AND ANTI-BRIBERY:

We are committed to operating our businesses conforming to the highest moral and ethical standards. We do not tolerate bribery or corruption in any form. This commitment underpins everything we do. Bribery and corruption can take many forms including cash or gifts to an individual or family members or associates, inflated commissions, fake consultancy agreements, unauthorized rebates, non-monetary favor's and false political or charitable donations. These actions may be undertaken directly or through a third party. It is illegal and immoral to, directly or indirectly, offer or receive a bribe. We uphold all laws relevant to countering bribery and corruption applicable to us in the conduct of our business. The Indian Prevention of Corruption Act, 1988 statute adopts different yardsticks to determine whether or not a particular act or omission is an offence thereunder.

iv. INSIDER TRADING REGULATION:

This is applicable to all Insiders of the Company including designated persons and immediate relatives of designated persons. The SEBI Regulations prohibit an Insider from Trading in the securities of a company listed on any stock exchange when in possession of any unpublished price sensitive information. Unpublished Price Sensitive Information ("UPSI") means any information, which relates, directly or indirectly, to the Company or its securities, which is not generally available which upon becoming generally available, is likely to materially affect the price of the securities of the Company. "Generally available" information means information that is accessible to the public on a non-discriminatory basis. Information which is published on the website of stock exchange/s where the securities of the Company are listed or published by way of a press release by the company, would ordinarily be considered generally available.

UPSI includes without limitation information relating to the following:

- Financial results, financial condition, projections or forecasts.
- Dividends (both interim and final)
- Change in capital structure.
- Mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions.
- Known but unannounced future earnings or losses.
- Significant corporate events, such as a pending or proposed acquisition or joint venture.
- Plans to launch new products or product defects that have a significant impact.
- Significant developments involving business relationships with customers, suppliers or other business partners.
- Changes in auditors as per statutory requirement or otherwise or auditor notification that the issuer may no longer rely on an audit report.
- Events regarding the Company's securities (such as repurchase plans, stock splits or changes in dividends, changes to the rights of security holders, public or private sales of additional securities or information related to any additional funding).
- Bankruptcies, receiverships or financial liquidity problems.
- Positive or negative developments in outstanding litigation, investigations or regulatory matters with significant impact on financial results; or
- Any changes to the Company's Board of Directors or the Company's key managerial personnel and key agreements with them.
- Any significant changes to the Company's capital structure

v. DRESS CODE:

A dress code for an office is a set of guidelines that determine what employees can wear at the workplace. Appearance is the first thing that people notice, dressing smartly automatically boost up the confidence and represents the organization.

The organization supports smart casuals, employees can wear informal and relaxed clothing as casual attire in a professional way. Employees need avoid any dirty, torn or revealing clothes at the workplace.

vi. CHILD LABOR:

Article 24 of the Indian constitution clearly states that, "No child below the age of fourteen years shall be employed to work in any factory or mine or employed in any hazardous employment. Our company strictly prohibits employment of under age 18.

vii. HUMAN RIGHTS POLICY:

We respect the human rights of all individuals impacted by our operations, including employees, contractors and external stakeholders. Wherever we operate, we seek to avoid causing or contributing to human rights violations and to facilitate access to remedy. While governments have the primary responsibility to protect against human rights violations, we understand and accept our responsibility to respect human rights. We do not tolerate violations of human rights committed by our employees, affiliates, or any third parties acting on our behalf or related to any aspect of one of our operations. We believe in fair employment practices and in a workplace in which all individuals are treated with dignity and respect. We do not tolerate discrimination against individuals on the basis of race, colour, gender, religion, political opinion, ethnicity, age, nationality or social origin, sexual orientation.

viii. RIGHTS OF PERSONS WITH DISABILITIES:

Our organization work in accordance with the principles of The Disabilities Act of 2016 which entails that All forms of discrimination against persons with disabilities are prohibited. The organization has provision of additional facilities or special benefits to disabled employees in order to increase their accessibility.

ix. HEALTH, SAFETY AND ENVIRONMENT:

Our Company is committed to Health, Safety & Environment (HSE). Everyone working for Shellinfo Global is expected to share this commitment by taking care of themselves, looking out for others, and protecting the environment. We have implemented and maintained processes and procedures which ensure compliance with relevant environmental regulations, compliance obligations and internal requirements. We act in support of minimizing the environmental impact of our business and workplaces by working toward carbon neutrality. And are also committed towards supporting initiatives to reduce the carbon footprint, waste, energy, and water usage of our workplaces. Aligned to its core values and in line with the Sustainability policy, the company intends to work towards conservation of natural resources with guidance from the top management and ensure sustenance.

x. ATTENDANCE AND LEAVES:**Attendance**

Our employee attendance outlines our expectations about our employees' coming to work. Being punctual when coming to work helps maintain efficiency in our workplace. The organization expect you to be punctual. This applies to all Employees, Trainees and Apprentices at NTIL. Employees must complete 9 working hours (inclusive of 1-hour break).

- Our Office Official Timings will be between 9:00 AM to 5:40 PM
- All employees are required to be present in the office by 9:00 AM. However, a grace period of 15 minutes (up to 9:15 AM) will be allowed.

The company has strict policy of late-night working hours, it is strictly prohibited for female employees to stay in office after 7:00 PM, in unforeseen and urgent circumstances they have a leverage of half an hour more subject to written approval from reporting manager.

Leaves

The organization provides leaves to the employees. We have total 24 leaves in a year out of which 17 Annual Leaves, 06 Sick Leaves & Public Holidays 10 Days.

The organization also provides Maternity and Paternity leave to the permanent employees. The female employees are provided paid leaves for a period of 26 weeks. The benefits of the leave can be availed for a period extending up to 8 weeks before the expected date of delivery and remaining 18 weeks can be availed post childbirth. The organization also provide leaves for a period of 12 weeks to female employees who legally adopt a child below the age of 3 months which are calculated from the date when the adoptive child is handed over to the mother.

The company also supports permanent male employees who is having a newborn child or who wants to adopt a child below the age of 3 months a leave for 3 days.

The company had declared leave on 2nd and 4th Saturday of every month. Every overtime done by the employee is compensated fairly in a below manner:

- Any employee reporting to the Office on a non-working day for a minimum of 5 hours will be eligible for 1 regular working day's salary.
- Any employee working from home on a non-working day for a minimum of 5 hours will be eligible for half the regular working day's salary, subject to proof given by the employee.
- Overtime can only be done after having prior written approval from the Departmental Head.

xiii. FRAUD, DISHONESTY or CRIMINAL CONDUCT

The organization does not permit fraud, dishonesty, or criminal conduct. We value ethics and integrity and will not tolerate fraud, dishonesty, or criminal conduct. The organization place a great deal of trust and confidence in our employees. In return, we expect you to act ethically and honestly in everything you do. Any use of fraudulent or illegal tactics violates that trust and carries potentially severe consequences, including discipline, up to and including termination. The organization will also cooperate with authorities to prosecute any act of fraud, dishonesty, or criminal conduct.

The organization prohibits fraud or dishonesty in connection with Company business including taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice, criminal conduct, or any violent activity on Company premises or while performing work for the Company. The employees will not cohere, threaten bodily harm to any customer or person and make sure that all the behaviour that they display towards the customer should be legally and morally viable.

Soliciting or accepting gifts (money, services, or merchandise) in connection with Company business will lead to violation of said Code of Conduct which will lead to disciplinary action against the employee.

Below acts of employee will lead to, but not limited to fraud, dishonesty and criminal conduct:

- Assisting anyone who you know or suspect to be involved in committing any crime or engaging in any conduct which rises to the level of a crime.
- Falsifying Company documents or records, including misuse of timekeeping records, or falsely inputting payment data.
- Insubordination, meaning refusing to follow legitimate instructions of a superior directly related to performance of one's job.
- Excessive absenteeism or unacceptable patterns of absenteeism.
- Conduct that is likely to cause another employee, customer or vendor of the Company embarrassment, loss of dignity, feelings of intimidation, or loss of opportunity, including all forms of discrimination and harassment.
- Unauthorized use of Company or customer supplies, information, equipment, funds, or computer codes/passwords.

xiv. SAFEGUARDING CONFIDENTIAL INFORMATION

For the Company, its confidential information is a valuable asset and every employee and agent of the Company must protect it. Confidential information includes all non-public information. It also includes personal information that we obtain in the course of business. We must take care that all confidential information is used for Company business purpose only and in case of personal information, in addition, it must be processed on instructions from the Company in accordance with laid out policies, procedures and guidelines and as per applicable privacy laws and regulations.

Upon joining the Company, all employees sign Confidentiality and Non-Disclosure Agreement which details their confidentiality obligations to the Company. As an employee, we have access to significant amount of Company information that may not be available to the public, and we should preserve the confidentiality of information obtained in the Company's service. Information of a confidential, private, and sensitive nature must be used responsibly and controlled and protected to prevent its prohibited, arbitrary or careless disclosure.

The employee will make sure of the systematic review and retention of documents received or created in the course of business. The employee will identify documents that need to be maintained, the documents should be kept, and saved by the employee in the company's valuable computer and physical storage space as per Companies Archival and Document Retention Policy.

xv. INTELLECTUAL PROPERTY

The Intellectual Property of the Company must be protected as a vital business asset. Our IP portfolio includes copyright, patents, trademarks, service marks, trade secrets, design rights, logos and know how. We must use our IP focusing on protecting these assets. It is important to ensure that to the extent permitted by law, the rights to all IP created using the Company's time and expense that which are within the scope of our duties are assigned to and are the property of the Company. We should promptly disclose any works; inventions or developments we create to obtain legal protection over them.

xvi. GIFTS

Employees may accept unsolicited gifts, other than money, which conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value (as permitted under Income Tax Act),
- Employees must not accept compensation, honoraria or money of any amount from entities with

whom the Company does or may do business.

- Employees with questions about accepting business courtesies should talk to their managers or the HR Department.

xvii. CONSEQUENCES AND DISCIPLINARY ACTIONS:

Corrective action and disciplinary action are important aspects of our compliance program for taking effective corrective action. Subject to local law, disciplinary action, up to and including termination of employment, will depend on several factors, including but not limited to:

- The conduct being intentional or deliberate or involving a law violation;
- The conduct involving dishonesty, theft, fraud, or personal gain;
- The conduct being repetitive or systemic or involving efforts to conceal;
- The employee's full and complete cooperation (or lack thereof) with the investigation;
- The employee's seniority within the organization; the higher the level of seniority, the higher the responsibility to act and to lead ethically. Employees will be provided with an opportunity to present any additional relevant information that may not have been considered before a disciplinary decision is made.

If you violate the Code, the Company will take appropriate disciplinary action. The matters covered in this Code are of the utmost importance to the Company, its shareholders and its business partners, and are essential to the Company's ability to conduct its business in accordance with its stated values.

We expect all our directors, officers, employees and third-party agents to adhere to these rules in carrying out their duties for the Company. We take violations of this Code, Company policies and applicable laws seriously. Where appropriate, the Company takes prompt corrective action, up to and including termination of employment. We strive for consistency and fairness in discipline for.

Code Violations

- Discipline may include a verbal or written warning.
- Suspension with or without pay.
- Loss or reduction of bonus or stock options.
- For the most serious offenses or repeated misconduct, termination of employment.
- Any disciplinary action depends on the nature, severity, and frequency of the violation.

Those who violate the laws or regulations mentioned in the Code could expose themselves and the Company to substantial civil damages and criminal penalties.

Corrective action may be taken if you:

- Violate the Code, Company policies and procedures, or applicable laws.
- Direct others to violate the Code, Company policies and procedures, or applicable laws.
- Are aware of a violation or potential violation and fail to report it.
- Fail to effectively monitor the actions of people you manage.
- Do not cooperate in a Company audit or investigation.
- Fail to participate in required training.
- Retaliate against someone for reporting a concern in good faith or for participating in an investigation of such a report.
- Disclose information learned during an internal investigation.

6. TRAINING AND AWARENESS

SGDT is committed to ensuring that employees understand and comply with this Code of Conduct and the Company's ethical, legal, and compliance requirements.

The Company shall provide appropriate training and awareness to employees and, where relevant, contractors and other stakeholders regarding the Code of Conduct, business ethics, anti-bribery and anti-corruption requirements, reporting mechanisms, and other applicable compliance requirements.

Training Frequency: Training on the Code of Conduct and relevant business ethics and compliance requirements shall be provided at least annually. In addition, appropriate training or awareness sessions may be conducted upon joining the Company, when there are significant changes to applicable laws, regulations, or Company policies, or whenever management considers such training necessary.

GENERAL NOTE OF SELF-EVALUATION

Because no code of conduct can cover every possible situation, the organization relies on you to use good judgment and to speak up when you have questions or concerns. The employees have a continuing obligation to familiarise themselves with all applicable law, policies, company-level policies, procedures and work rules as relevant to the business and in general.

This Code is more than a set of prescriptive guidelines issued solely for the purpose of formal compliance. It represents our collective commitment to our value system and to our core principles. Every person employed by us, directly or indirectly, should expect to be held accountable for his/her behaviour. The company encourage the employees, customers, suppliers and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of our Code, policies or law. We also encourage reporting of any event (actual or potential) of misconduct that is not reflective of our values and principles.