



Code of Business Conduct and Ethics

(COBE)

June 2024

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1 Introduction and Purpose

Evalueserve's Code of Business Conduct and Ethics is based on the core values of the organization considering the ambition of the group.

Evalueserve has adopted and incorporated as its ambition to be the leading and most innovative provider of research, analytics, and data management services.

The main purpose of COBE is to:

1. Encourage and promote the work culture of honesty, integrity, and mutual respect.
2. Establish a mechanism to resolve various ethical issues within the organization.

MISSION (OUR ROUTE TO SUCCESS):

In a world overloaded with data, every company wants analytics that drive outcomes. To get there, one needs a responsive agile partner to turn one's data into actionable information and hence, Evalueserve comes into place. Our 4,500+ committed experts use a decision-based architecture to create AI-based products and solutions that produce outcomes in almost real-time. Whether one choose to receive analytics via a BI tool, one of our platforms, email, SMS, or even a traditional PPT, one can make decisions in the moment. Discover our relentless drive to activate data, analytics, and research.

VALUES:

Our values form the backbone of every decision we make, every initiative we take on, and every interaction we have with one another. We seek to improve ourselves every day, and by extension, our clients and partners with key initiatives including efforts in:

- a) Diversity & inclusion
- b) Social responsibility
- c) Sustainability

2 Applicability

Code of Business Conduct and Ethics (COBE / Code) provides ethical guidelines for conducting business on behalf of Evalueserve, including its subsidiaries and affiliates.

COBE applies to all employees (“Employees”), suppliers, vendors, sub-contractors, and consultants (“Representatives”) working across all Evalueserve locations.

Evalueserve sets standards for integrity in everything we do. We demand this of ourselves, just as others – such as our shareholders and customers – expect this from us. We require all our Representatives globally to perform their duties diligently and in compliance with this Code along with other policies that are in place at Evalueserve.

3 General Principles

COBE sets forth legal and ethical standards and provides an overview of Evalueserve's guiding principles. The code is not exhaustive and does not cover every conceivable situation an Employee or a Representative may encounter. For that, we are highly reliant on the judgment and discretion of individual Employees or Representatives; it is for them to decide what is right, including a decision to obtain guidance from others on the appropriate course of conduct.

COBE is a dynamic document that will evolve over time as we continue to apply best practices and principles to the complex and diversified issues / situations related to business conduct and ethics. However, as we change, refine, and adapt our best practices, the organization's commitment to integrity and honesty will always remain consistent.

3.1 Employee Responsibility

All Employees at Evalueserve are expected to do the following:

- Understand the importance of Evalueserve policy(ies) and / or guideline(s) in relation to their job and follow them diligently and consistently.
- Be conversant with the information contained in the Code and about their compliance obligations at Evalueserve and ensure that they fulfil such compliance obligations within the stipulated timelines.
- Complete all their compliance requirements within the agreed timelines and keep themselves abreast with the current standards and expectations; use good judgment and always demonstrate a high degree of personal integrity and honesty, even in situations that are not specifically addressed by COBE or by an Evalueserve policy.
- Be aware of the fact that any violation of Evalueserve policy(ies) and / or guideline(s) will result in disciplinary action against such Employee (including but without limiting to immediate termination of employment).
- Apprise themselves of the latest applicable data protection laws / regulations to ensure data privacy compliance and safeguard their personal data.

3.2 What Managers Need to Know

In most cases, an Evalueserve manager will be the first point of contact for the Employee who believes that an Evalueserve policy has been violated. Thus, managers play a vital role in ensuring compliance with COBE, Evalueserve policies and guidelines, and applicable laws and regulations. The managers must:

- Be familiar with Evalueserve's policies and guidelines, so that they can train the team members on policies related to their jobs, create awareness on the practices prevalent at Evalueserve, and attend to Employees' expectations with respect to such policies.
- Be perceptive to potential problems or compliance issues that could arise in their area of responsibility.
- Cooperate and facilitate audits and investigations and never modify or destroy any evidence if any investigation is anticipated.
- Be proactive in responding to potential issues revolving around their work areas and ensure timely reporting of such concerns, so that prompt and corrective actions can be taken at the right time, where the situation so warrants.

4 Evalueserve's Commitment

4.1 Equal Employment Opportunity

Evalueserve is committed to providing equal employment opportunities to all new applicants and Employees. Individuals, at Evalueserve, will be hired and promoted based on their qualification, performance, and abilities. Evalueserve's employment practices will comply, in all respects, with applicable laws and regulations. The fundamentals of Evalueserve's employment policy are as follows:

- Equal employment opportunity will be provided to all persons, regardless of their race, color, sex, religion, sexual orientation, national origin, disability, veteran status, or any other category protected by the law.
- All conditions of employment, including but not limited to recruitment, promotion, compensation, benefits, transfers, layoffs, return from layoff, company-sponsored training, education, and social and recreational programs, will be dispensed with, without regard to race, color, sex, religion, age, sexual orientation, national origin, disability, veteran status, or any other category protected by the law.
- Evalueserve will ensure that all recruitment and hiring processes are conducted in a fair and unbiased manner, with decisions based solely on the qualifications, skills, and experience of candidates.
- Work assignments and responsibilities will be assigned based on job requirements and individual capabilities, without regard to protected characteristics.
- Performance evaluations will be conducted based on objective criteria and job-related factors, ensuring fairness and impartiality in the assessment process.
- Employee benefits, including health insurance, retirement plans, and other perks, will be provided equally to all Employees, without discrimination based on protected characteristics.
- Evalueserve is committed to resolving conflicts and grievances in a fair and equitable manner, providing a supportive and respectful workplace environment for all Employees.
- All Employees, including managers and supervisors, are expected to comply with this policy and uphold principles of equal opportunity and non-discrimination. Violations of this policy will result in disciplinary action, which may include termination of employment.

The HR department and managers will ensure that all Employee selection activities are carried out in line with the prescribed Employee selection guidelines covered by the applicable laws.

4.2 Safe Workplace – Zero tolerance towards harassment

Workplace harassment, whether verbal, written, or physical, is not tolerated at Evalueserve. Evalueserve is determined to provide a workplace free from all types of discrimination and / or harassment.

Workplace harassment is defined as offensive and / or unwelcome behavior and / or conduct toward an individual based on diverse human characteristics and / or cultural background (such as age, race, gender, color national origin, disability, caste, creed religion, sexual orientation, or any other diverse human characteristic) that substantially interferes with an individual's employment or creates an intimidating, hostile, or offensive work environment for that individual. Workplace harassment does not refer to performance-based discussions or other appropriate business-related conversations.

Some examples of workplace harassment are:

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- **Verbal Harassment:** This includes derogatory remarks, insults, offensive jokes, or comments about a person's race, gender, ethnicity, religion, disability, sexual orientation, or other protected characteristics.
- **Physical Harassment:** Any unwelcome physical contact or advances, such as touching, groping, or assault, constitutes physical harassment.
- **Non-Verbal Harassment:** This includes gestures, facial expressions, or other non-verbal cues that convey hostility or discrimination based on protected characteristics.
- **Bullying:** Persistent mistreatment, intimidation, or humiliation of an individual, often through repeated aggressive behavior or verbal abuse, constitutes bullying.
- **Cyber Harassment:** Harassment through electronic communication channels, such as emails, text messages, social media platforms, or online forums, is also a form of workplace harassment.
- **Discrimination:** Treating someone unfavorably because of their race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age, disability, or genetic information constitutes discrimination and can contribute to a hostile work environment.

Sexual harassment is a specific form of workplace harassment which includes unwanted sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature can create a hostile work environment. Evalueserve will take strict disciplinary action against those who harass Employees or Representatives (refer to Evalueserve **Prevention of Sexual Harassment at Workplace Policy** for more information).

4.3 Human Rights

We, at Evalueserve, are dedicated to ensuring that there is no modern slavery or child labor or forced & bonded labor in any part of our business or supply chain and to ensuring that our business is conducted in an ethical and honest manner. Evalueserve restricts the use of child labor, servitude, human trafficking, and forced & bonded labor within its supply chain according to the local laws and regulations.

In accordance with our corporate ethical practices, we condemn the use of forced labor, child labor, servitude, human trafficking, forced & bonded labor and modern slavery, or any other form of involuntary labor and strictly say "no to such practice" as prescribed and governed by the local laws and regulations. Evalueserve has zero tolerance of factors that independently or in combination may increase the risk of such practices in the employment cycle: for example, physical abuse and humiliating discipline.

We strive to deploy appropriate measures for tackling modern slavery in the workplace. Everyone involved in Evalueserve's supply chain, should not engage (directly or indirectly), and promptly report the instances or suspected instances of modern slavery in the Evalueserve's operations or supply chain, or in the supply chain of the people who are engaged to provide services in connection with the Evalueserve platform services. We have adopted procedures such as the Whistleblowing mechanism to enable and encourage Employees to raise incidents of unfair treatment / misconduct or wrongdoing at the workplace. Evalueserve has a Whistleblower policy, which is posted on the iKnow portal under the Compliance tab, accessible to all Employees and available at our website.

4.4 Ethics

Employees and Representatives at Evalueserve should abide by the ethical practices while rendering services or while undertaking any task for and on behalf of Evalueserve. Ethics refer to a set of moral values and principles that are expected out of the Employees and Representatives to be followed in a business environment. These set of norms, values, and ethical and unethical practices are the principles that guide a Representative or an Employee on how they should work within/with the organization. We, at Evalueserve, believe that ethics plays a crucial role in harmonizing stakeholder relationship. Therefore, it is expected at Evalueserve to observe ethics in whatever task we undertake. Representatives should have a clear understanding of what is a correct practice as well as what should be done to adopt the correct practice and what should be avoided.

4.5 Information Security

Evalueserve has implemented stringent controls within the organization to ensure the protection of its Employees' and clients' information in accordance with ISO 27001: 2022 standards.

Evalueserve has deployed controls to ensure that data and information is accessible only to those who are authorized to have access to it and that such data and information is protected throughout its lifecycle. All the Evalueserve Employees including the management have an obligation to maintain the confidentiality of the information that they have access to, even when they leave the organization. Employees must never, directly, or indirectly, disclose or use for the benefit of any person or for any business organization any of the confidential information pertaining to Evalueserve. Breach of the confidentiality obligations toward the clients may result in legal liability of both Evalueserve and the Employees.

4.6 Compliance with applicable laws and regulations

Evalueserve ensures that it complies with relevant legislations and conducts business within the framework of applicable laws and regulations. Violation of laws, regulations, rules, and orders may subject the violator to individual criminal or civil liability, as well as to disciplinary action by Evalueserve.

4.7 Compliance with Embargoes

Evalueserve's policy does not allow participation in boycotts, embargoes, or other restrictive trade practices prohibited or penalized under applicable local laws of the countries in which business is conducted, unless sanctioned by the government. Thus, Evalueserve strongly advocates that its Employees and Representatives are aware of all such laws and consult the Compliance Team in case of doubts.

4.8 Compliance with Evalueserve policies

a). Gift & Entertainment Policy

It is against Evalueserve's policy to give or receive anything of value to gain an unreasonable competitive advantage, hence any gift or entertainment shall not be taken/received with the intention of influencing or rewarding business decisions.

- No Employee and Representative shall solicit or accept gifts, favors, loans, or preferential treatment from any person or entity that does business or seeks to do business with Evalueserve.
- Employees and Representatives are prohibited from offering bribes, kickbacks, illegal political contributions, or other improper payments to any client, government official, or third party that may fall outside the parameters of applicable laws and evoke any adverse action against Evalueserve and create the impression of seeking an improper advantage.

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- No Employee and Representative shall, in violation of any applicable law, make or offer to make, directly or indirectly, through any other person or firm, any payment of anything of value (money, gift, contribution, etc.), significant gifts, or provide any extravagant entertainment to a client or supplier without approval.

Evalueserve employs only reputable, qualified individuals and firms who agree to be bound by and act in accordance with the provisions of this policy, to act as Employees, consultants, partners, agents, or sales representatives (*refer to **Evalueserve Gift & Entertainment Policy** for more information*).

b). Insider Trading and Stock Tipping-off

Employees and Representatives, who have access to inside information (also known **as material non-public / unpublished price sensitive information**), are not permitted to use or share such information for any purpose other than to conduct Evalueserve's business.

All non-public* information about Evalueserve, or companies / clients with whom Evalueserve does business, is considered confidential information. To misuse material non-public information in connection with buying or selling securities, including tipping others who might make an investment decision on the basis of this information, is illegal and is strictly prohibited by Evalueserve.

In order to avoid violating laws related to insider trading and tipping, each Employee or Representative who has inside information about Evalueserve, or about another company that he/she has obtained by virtue of his or her position with Evalueserve, is expected to abide by the following guidelines:

- Never buy, sell, or suggest to someone else (including family members) that they should buy or sell stock or other securities of any company while you are aware of material non-public information about that company. Material non-public information constitutes information that is unavailable to the public and that an ordinary investor would consider as important while making an investment decision.
- Never pass on or disclose material non-public information unless necessary for the conduct of Evalueserve business—and never pass on or disclose such information if you are not authorized to do so and suspect that the information will be used for improper trading.
- Do not evade these guidelines by acting through anyone else or by giving material non-public information to others for their use, even if you will not financially benefit from it directly.

All queries in this regard should be referred to the Compliance team (*refer to **Evalueserve's policy for "Prevention of Insider Trading Policy"** for more information*).

c). Media Communication Guidelines

Evalueserve is committed to providing accurate information to the public in a timely, orderly, and consistent manner. Evalueserve will comply with applicable laws and regulations regarding required mandatory legal disclosures. The Executive Team members are the designated spokespersons for Evalueserve and they may, from time to time, designate other persons (via a written approval) to speak on behalf of Evalueserve with respect to a specific issue, or to respond to specific inquiries from the investment community or the media.

Specifically, Evalueserve prohibits the disclosure of non-public¹ corporate material information to media, securities market, investors, and potential investors, unless the communication is made:

- To a person who owes a duty of trust or confidence to Evalueserve

¹ "Non-public" information is any information that has not been disseminated in a manner reasonably designed to make it generally available to public.

- To a person who has signed a confidentiality agreement
- To a rating agency, for the sole purpose of developing a credit rating that will be publicly available.
- Information is “material” if there is a substantial likelihood that a person / entity would consider it important in making an investment decision.

Any Employee or Representative who receives an inquiry from an investor or the media must immediately inform the Marketing team about the situation and follow their guidance at marketing@evalueserve.com.

All Employees and Representatives are required to adhere to the guidelines and protocol communicated to them from time to time (*refer to **Evalueserve Media Policy** for more information*).

d). Protection of personal Information

Evalueserve values the privacy and security of all personal information it receives. The company is dedicated to following global data protection laws and regulations. Evalueserve will uphold the confidentiality of this information and limit access to those who require it. All individuals associated with Evalueserve, whether Employees or external partners, are committed to complying with relevant data protection laws and regulations. Evalueserve has implemented proper procedures for processing and managing personal information and ensures that Employees are well-informed about their legal obligations and responsibilities in this regard (*refer to **Data Protection Policy** for more information*).

4.9 Business Relationships

This COBE also applies to all business partners and their Employees, including clients, contractors, agents, suppliers, vendors, and others working on their behalf worldwide (“Business Partners”). To foster long-lasting relationships with Business Partners, it is necessary that we conduct our business fairly, honestly, and with integrity.

Relationship with Clients - Information given to clients should be accurate and complete, leaving no room for any misrepresentation of information, and clients must not be discriminated against because they opted to use the services or products of other suppliers.

Relationship with Suppliers - Objectivity should be used while dealing with suppliers / potential suppliers and Employees and Representatives should never accept or solicit personal benefits, which may compromise their decision-making ability.

Relationship with Competitors - Employees and Representatives should deal with competitors in accordance with best practices and should not: (i) misappropriate and / or misuse competitors’ confidential information, (ii) make false statements about competitors’ business, or (iii) enter into agreements with competitors that may constitute illegal price-fixing.

Evalueserve expects its Business Partners to meet the standards set out in this Code and the Supplier Code of Conduct which is available on Evalueserve’s website. Evalueserve asks our Business Partners for cooperation in helping to assess, audit, and address any issues inconsistent with this Code.

4.10 Anti-Trust and Fair Competition

Evalueserve is committed to conducting its business in accordance with all applicable antitrust and competition laws. We believe in promoting fair competition and ensuring that our business practices do not restrict trade or reduce competition. All Representatives are expected to uphold these principles in every aspect of their work and ensure that our business practices reflect our commitment to fair

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competition. All Representatives must comply with the anti-trust laws of the countries in which we operate.

Prohibited activities:

All Representatives must avoid any activities that could be construed as anti-competitive, including but not limited to:

Price Fixing: Agreeing with competitors to fix prices, discounts, or terms of sale.

Market Allocation: Dividing markets, customers, or territories among competitors.

Bid Rigging: Coordinating with competitors on bids or proposals to manipulate the outcome of a bidding process.

Exclusionary Practices: Engaging in conduct that unfairly excludes competitors from the market or creates unfair barriers to entry.

Tying Arrangements: Requiring customers to buy one product or service as a condition for purchasing another.

By adhering to Anti-Trust and Fair Competition laws, we contribute to a fair and competitive marketplace, which benefits consumers, businesses, and the overall economy.

4.11 Employee's and Representative's conduct

a). Alcohol, Substance Abuse, and Other Prohibitions

Evalueserve is determined to provide a workplace free from any type of alcohol and substance abuse. Evalueserve has a strict policy on substance abuse, which includes alcohol abuse and use of illegal drugs and controlled substances. Employees and Representatives are not permitted to report to work or conduct Evalueserve business on the Company premises or operate Company vehicles while under the influence of alcohol, drugs, and / or controlled substances. This also applies to any other work site or any other premises / location from where Employees are operating and/ or Representatives are assigned during work hours or are representing Evalueserve in a professional capacity.

The consumption, purchase, sale, manufacture, trafficking, possession, and / or distribution of illegal substances are against Evalueserve's policy. Serving alcoholic beverages to clients, guests, or Employees on Evalueserve premises is strictly prohibited. The only exception to the above consumption of alcoholic beverages is at Evalueserve events, where such consumption has been specifically permitted. Even during such events, intoxication or excessive use or abuse of alcohol is prohibited; Evalueserve expects Employees to exercise propriety and ethical conduct at such events.

To create a safe working environment, Evalueserve has a zero-tolerance policy against workplace violence. Workplace violence includes any coercive and unethical activities that create an environment of fear and has the potential to create a risk to health, safety, and the wellbeing of Employees. Furthermore, Evalueserve strictly prohibits the possession of firearms or other weapons on Company premises.

b). Protection of Evalueserve Assets

All Employees and Representatives should protect Evalueserve assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on our profitability. All Evalueserve assets are to be used for legitimate business purposes only. Any suspected incident of fraud, misuse, or theft should be immediately reported for investigation. Evalueserve assets should not be used for personal benefit.

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Physical assets: Evalueserve assets include physical assets, such as facilities, systems, equipment, materials, and corporate charge cards. All Employees must adhere to the following guidelines to judiciously use Evalueserve assets and protect them from loss, theft, or misuse:

- Use Evalueserve assets appropriately and protect them when not in use.
- Do not give or lend these assets to anyone without approval.
- Display Evalueserve identification badge while on Evalueserve premises.
- Use electronic access control cards that provide access to Evalueserve facilities and systems.
- Do not admit / allow access to unauthorized individuals into Evalueserve facilities.
- Be aware of and understand Evalueserve's security policies and procedures. Employees should also be alert and aware of situations or incidents that could lead to the loss, misuse, or theft of Company assets.
- Notify the Administration Department immediately if any asset is lost, misused, or stolen.
- Notify the Whistleblower Committee if one suspects any fraudulent activity.

Computers and other information systems: Evalueserve maintains a wide spectrum of technology (including electronic communications technology) for legitimate business activities to be conducted by authorized individuals in support for its business needs. Evalueserve expects Employees to use all Company information assets, including computers, laptops, printers, fax machines, scanners, telephones, voicemail, and software, responsibly. Evalueserve's connection to the internet and its intranet systems are solely for business purposes. Employees who misuse information systems may lose access privileges and, depending on the severity of the situation, may also be subject to strict disciplinary actions, including dismissal. The policy prohibits the following activities related to the use of Company information assets:

- Using the assets for any illegal activity, including pornography, pyramid schemes, gambling, and / or software piracy.
- Commercial or political use, such as running a personal business, and / or promoting a political candidate.
- Circulating chain email, emails of a lewd nature, virus hoaxes and / or actual viruses, or downloading unauthorized software or materials.
- Harassing and / or threatening communication, including defamatory, libelous, or slanderous comments.
- Intentional concealment or misrepresentation of one's identity.
- Any form of pornography and / or offensive material, in tangible or intangible form.
- Use of systems in any other way that interferes with any Employee's productivity and / or that of others.
- "Hacking" or attempting to "hack" or obtain unauthorized access to any Evalueserve computer or computer network.
- Copying, lending, reselling, or transferring software; installing personal software, or software that is lewd or obnoxious in nature.
- Damaging, circumventing, and / or harming the security controls designed to protect Evalueserve information systems or equipment.

Other general guidelines that an Employee must abide by are as follows:

- Do not store sensitive client or personal information on Evalueserve computers.
- Promptly report any suspected violation and / or virus attack by raising an incident with the Information Security team.
- Use licensed / legally authorized software – Software used at Evalueserve may be owned by other companies and protected by copyright laws and / or license restrictions. Before acquiring or using any such software, Employees are required to contact the IT department and / or legal

department to ensure that all third-party intellectual property (IP) rights related to such software are fully complied with (*refer to **Evalueserve End User Computing Policy** for more information*).

Proprietary information: Proprietary Information is any information owned by and related to Evalueserve, such as information on Evalueserve's databases; businesses; clients / customers; personnel details; medical and salary records; copyright protected materials; technical or scientific information relating to current and future products, services, or research; business or marketing plans or projections; earnings, credit, and other financial data; and executive and organizational change, software, and other confidential information relating to the Company. All Evalueserve proprietary information is confidential in nature, unless specifically classified otherwise. This information may also be subject to copyright, patent, and other IP laws.

Evalueserve's proprietary information is the result of the ideas and hard work of many Employees and of substantial investment by the Company on planning, research, and development. This information, particularly Evalueserve's confidential information, gives Evalueserve a competitive advantage in the marketplace. Evalueserve is prone to be adversely affected by unauthorized disclosures of its proprietary or confidential information to unauthorized recipients, or by the unauthorized use of such confidential information by any person who is strictly prohibited or restricted from having access to such information. Evalueserve's proprietary information should be always protected from unauthorized access.

c). Authority to Make Business Commitments

The authority to make business and / or financial commitments on behalf of Evalueserve has been clearly defined by way of clear delegation of authority. All Employees and Representatives are expected to work in accordance with such delegation of authority. Employees and Representatives should not make any oral or written commitments, arrangements, or promises of business that create a new agreement or modify an existing agreement with a third party without proper approval. Such commitments should be made by those having defined authority, and while acting within the limits of the said authority. All forms of misrepresentation, fraud, dishonesty, and deception are to be avoided by Employees and Representatives.

d). Conflict of Interest

Employees and Representatives must avoid relationships that create a perceived or actual conflict between their obligation to Evalueserve and self-interest. An Employee's financial, business, or other non-work-related activities must be lawful and free of conflict with the Employee's responsibilities toward Evalueserve. Employees and Representatives must not, as a part of engaging in any outside activities, misuse Evalueserve resources, discredit its name and reputation, or affect its business in any way. Employees and Representatives should not participate in any business or personal relationships, activities, or dealings that might adversely affect Evalueserve.

Although it is not possible to provide a comprehensive list of every possible situation that may lead to a conflict of interest, given below are a few illustrations of possible conflicts of interest:

- You (or your family member) have a significant financial interest in a company (clients / suppliers) that has dealings with Evalueserve, and you are in a position to influence those dealings if you have access to non-public information about that company.
- You (or your family members) have a significant financial interest in a company that competes with Evalueserve.
- A family member is a director, officer, Employee, or consultant in a company (clients / suppliers) that has business dealings with Evalueserve or competes with Evalueserve.
- Your participation as a director, officer, Employee, consultant, or promoter in an outside business prevents you from devoting full time to your job at Evalueserve.
- Accepting gifts from suppliers, clients, or competitors.

- Potential conflict resulting from a family member or close friend working for or owning a supplier of Evalueserve.
- Any outside activity or relationship that could reasonably be interpreted as conflicting with the interests of Evalueserve.
- Providing assistance to an organization that markets products and services in competition with Evalueserve's current or potential products or service offerings.

4.12 Financial Controls, Records, and Auditing

Evalueserve is required by law to maintain and preserve all corporate and business records accurate and honest and report any financial irregularity. The integrity of our records and public disclosure depends upon the validity, accuracy, and completeness of the information supporting the entries in our books of account. Financial statements and reports are prepared in accordance with the Generally Accepted Accounting Principles, accounting standards, applicable laws, rules, and regulations for accounting and financial reporting of transactions, estimates, and forecasts. Making false or misleading entries is strictly prohibited. Employees, who collect, provide, or analyze information for, or otherwise contribute in any way to preparing or verifying the financial reports, should strive to ensure that our financial disclosure is accurate and transparent.

All Employees and Representatives are required to:

- Follow the prescribed accounting and reporting procedures.
- Be accurate in preparing and compiling financial records and ensure that the records are secured and maintained as per statutory requirements.
- Obtain all necessary approvals before releasing any financial information outside Evalueserve.
- Ensure that all financial records and reports, whether in hard copy or electronic / computer-based format, are securely maintained and preserved for a tenure as prescribed under applicable laws.
- Grant Evalueserve's internal and external auditors and other authorized individuals' access to all appropriate Evalueserve records and provide them with accurate and complete information, as they may from time to time require.
- Promptly report any concerns about possible violations of this policy to the Whistleblower Committee (*refer to **Evalueserve Whistleblower Policy** for more information*).
- Report violations / any suspected breach of applicable data protection laws to the DPO via email (dp@evalueserve.com) or through the incident reporting mechanism available on iKnow.

Auditing: Evalueserve is committed to providing accurate information to external and internal auditors in a timely, orderly, and consistent manner. Employees are prohibited from directly or indirectly taking any action to manipulate, mislead, or fraudulently influence external and internal auditors. Prohibited actions include:

- Issuing or reissuing a report on the Company's financial statements that is not warranted in the circumstances (due to material violations of generally accepted accounting principles, generally accepted auditing standards, or other professional or regulatory standards).
- Non-performance of audit, review, or other procedures required by generally accepted auditing standards or other professional standards.
- Withdrawal of an issued report.
- Non-communication of matters to the Audit Committee.

4.13 Environment, Health, and Safety

Evalueserve strives to comply with all relevant environmental, health, and safety laws and regulations, and to provide each Representative with a safe and healthy work environment. Each

Employee is responsible for maintaining a safe and healthy workplace for fellow Employees and Representatives by following environmental, safety, and health rules and practices, as well as reporting accidents, injuries, and unsafe equipment, practices, or conditions. We would ensure the prevention of wasteful use of natural resources and maintain clean environment in all areas of business activities.

All Employees and Representatives are expected to:

- Efficiently utilize natural resources, minimize waste through recycling.
- Ensure the minimization of impact on environment and actively promoting sustainable practices.
- Maintain a clean and healthy workspace that does not present any hazard to anyone.
- Report circumstances that might lead to health and safety risks for Employees or the visitors.

4.14 Corporate Citizenship

Evalueserve is committed to good corporate citizenship and working for the welfare and benefit of the communities in which it operates. As part of the CSR / Social responsibility initiatives, Evalueserve empowers its centers operating in various parts of the world to enact measures that serve their local community's needs. It is ensured that such initiatives also comply with the local laws, wherever applicable, and each center is also empowered to formulate its own CSR policy as may be required by the applicable laws.

Evalueserve is committed to integrating sustainability into its business and value chain. Our ESG commitment statement is aimed at strengthening and advancing our sustainability initiatives. It reflects our vision of having robust environmental stewardship, empowered communities, and effective corporate governance. Our comprehensive statement factors in all our stakeholders, including suppliers, clients, investors, Employees, and other partners. The United Nations Sustainable Development Goals and the United Nations Global Compact principles guide our sustainability strategies and inform how we deliver our overarching commitments. Through our ESG commitments, we aim to promote safety, well-being, competence, and responsibility in a manner that protects our Employees, strengthens communities, involves other stakeholders, and conserves the environment.

5. Reporting Violation of Code

Every Employee and Representative at Evalueserve is obligated to adhere to this Code and all existing policies and procedures of Evalueserve, and is expected to report in good faith, any suspected violation / fraud / breach in accordance with the reporting procedures as stated in the Whistleblower Policy. Employees and Representatives must adhere to the Code in letter and spirit. It is reiterated that this Code is not intended to be totally comprehensive, and Evalueserve relies on its Employees and Representatives to exercise discretion and engage in ethical conduct consistent with this Code.

Violations of / non-compliance with this Code may subject the violator to individual criminal or civil liability (including penalties and fines), as well as to strict disciplinary actions by Evalueserve (including dismissal). Disciplinary action may also be initiated for entertaining or participating in a violation, knowingly failing to report a violation or suspected violation, refusing to cooperate with the investigation of a suspected violation, and retaliating against an individual who reported a suspected violation in good faith.

If an Employee / Representative intends to seek any further information / clarification about this policy, they may connect with:

1. Their manager
2. Human Resource (HR) department
3. Legal & Compliance team by raising a query on GRC Archer tool.

Employees must promptly report concerns about violation of any laws, regulations, or the COBE to their manager, HR department, or Legal & Compliance team.

In case you need to report any concern / non-compliance / incident and want to keep your identity anonymous, you may contact the Whistleblower Committee (*refer to **Evalueserve Whistleblower Policy** for more information*).

Message from Management

Dear colleagues,

Evalueserve, ever since its inception in 2000, has been upholding the highest standards of governance and creating value for all stakeholders. We maintain elevated ethical standards to sustain our brand value, which is based not only on service quality but also on ethical, moral, and legal principles. We promote transparency by embracing fairness, honesty, and integrity, thereby driving the overall growth and long-term value of our company. Evalueserve has implemented this Code of Business Conduct and Ethics (COBE / Code) to ensure that all stakeholders associated with Evalueserve understand the company's expectations regarding personal integrity and ethical behavior. While all Employees must comply with COBE, managers have the additional responsibility of serving as role models by demonstrating exemplary conduct and guiding their team members.



Ravi Mehrotra

CEO

