



BUSINESS PRACTICE POLICY

Version Number: 1.0

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1. PURPOSE:

To lay down guidelines for all employees in AM/NS India Limited so as to bring about a uniform and disciplined approach in portraying ourselves as an organization.

2. SCOPE:

This policy is applicable to all regular employees in grade M-01 to M-11 based in India including Advisors working in India.

3. CONFIDENTIAL MATTERS:

- No employee shall divulge or use, except in furtherance of the Company's interests, any business or technical information which may come to his knowledge in the course of his employment with the company or its parent company or its associates / sister companies. This shall apply both during the period of employment and thereafter.
- No employee shall participate in or be associated with any radio/television broadcast or in any publication or communication to the press or public speeches / utterances without prior written approval of the Management, if it would involve disclosing business / technical information of the company.
- In general, he / she should ensure that his/her participation should in no way jeopardize the interests of the company.
- Members of the staff except where necessary shall not, without the prior written consent of the company retain in their private possession, any papers / documents / specifications / records etc. relating to the company's business. All such material shall be returned to the company once the work is completed and on separation from the company.
- No employee shall acquire any patent rights in relation to any products/goods which the company makes or may make in the course of his employment. Any process developed by any employee for the improvement of the company's business or products or if, as a result of any Research / Developmental activity, any employee, comes to know of or develops any better process or formulae, he / she will pass on this to the company for having them patented. These will be the property of the company.

4. PRIVATE TRADE/EMPLOYMENT:

- All employees are whole time employees of the Company. No employee shall, except with the prior written permission of the Management, engage either directly or indirectly in any trade or business or undertake any other employment or consultancy or undertake such trade / business / consultancy etc. on behalf of anyone else, either with or without remuneration, during the course of his employment with the Company.
- However, they may, without prior approval, undertake honorary work of social, charitable or religious nature or occasional work of literary, artistic nature, provided that such work does not interfere with the performance of his duties.
- No employee shall accept any pecuniary advantages or any fees for any work done by him/her for any public body / private organization or individual without the written permission of the Management.

- Any employee currently engaged in any activity / business / trade as defined above is required to declare such association to the Management with full details and discontinue his association if so directed by the Management.

5. GIFTS FROM SUPPLIERS AND CUSTOMERS:

- No employee shall, either directly or indirectly, accept gifts either in cash or in kind whether in India or abroad. Any gift so received from any source or from any person with whom the Company has business dealings, should immediately be surrendered to the Management.
- This will, however, exclude Near Year or Seasonal gifts [in the form of Table items, key chains, etc.] of nominal value from each source, but will include provision of free transport boarding or lodging or any other service or facility to the employee or his family / relatives / friends, whether specifically requested for or otherwise, in India or abroad.
- Official foreign contacts should not be asked to provide services / facilities / items against rupee payments.

6. DEALINGS WITH COMPANY'S SUPPLIERS / CUSTOMERS:

- No employee shall, either directly or through any other person or relation, be associated with any suppliers of goods / materials / services to the Company
- Similarly, no employee shall have, either directly or indirectly, any business arrangement outside the limit of the Company's dealings, or use his position for any personal benefits or for any benefits to any friend or relation, with/from any of the company's customers /agents/suppliers.
- No employee shall have either directly or indirectly, any business and personal relationship with the Company's present suppliers of goods / materials / services (including consultants) and customers and undertake to disassociate themselves from such suppliers/customers as and when directed to do so by the Management.
- If, in future, there is a likelihood of any conflict of interest on this account, prior written approval of the Management will be necessary and the decision of the Management will be final and binding.
- Concealment of such information will be viewed as misconduct.

7. MEMBERSHIP OF POLITICAL PARTIES/ BODIES:

No employee shall either be associated with or is an active member of any political party, body or organization, or shall take part in any political activity or demonstration.

8. COMPANY PROPERTY EQUIPMENT:

All property of the Company (including Co. Flats / Co. leased accommodation) entrusted to the employee during his employment shall be returned in good condition on separation from the Company or as and when directed by the Management.

9. MISCELLANEOUS PROVISIONS:

- Every employee shall abide by the laws of the land and behave/act in such a manner which will not violate any accepted norms of public decency or morals or bring a bad name to the Company.

- Any employee convicted by the Court of Law or arrested on any charge, shall, at once report the facts to the Management.
- Every employee shall avoid habitual indebtedness and report to the Management, if he has applied for insolvency or has been declared insolvent.
- No employee shall attempt to bring political, governmental or outside pressure or influence on the Management to further his interests on matters connected with or related to his employment in the Company.

Approved by:



Dilip Oommen
Chief Executive Officer