

**EMPLOYEE CODE OF CONDUCT**

**OF**

**SJP ULTRASONICS LIMITED**  
**(FORMERLY KNOWN AS SJP ULTRASONICS PRIVATE**  
**LIMITED)**

## **Employee Code of Conduct:**

As an employee, you are responsible to behave appropriately at work. We outline our expectations here. We can't cover every single case of conduct, but we trust you to always use your best judgement.

Reach out to your manager or HR if you face any issues or have any questions.

### **Dress code:**

Our company's [official dress code](#) is [*Business/ Business Casual/ Smart Casual.*] This includes [*Indian Casual/ Sandals/ boots.*] However, an employee's position may also inform how they should dress. If you frequently meet with clients or prospects, please conform to a more formal dress code. We expect you to be clean when coming to work and avoid wearing clothes that are unprofessional (e.g. workout clothes.)

As long as you conform to our guidelines above, we don't have specific expectations about what types of clothes or accessories you should wear.

We also respect and permit grooming styles, clothing and accessories that are dictated by religious beliefs, ethnicity or disability.

## **Cyber security and digital devices:**

This section deals with all things digital at work. We want to set some guidelines for using computers, phones, our internet connection and social media to [ensure security](#) and protect our assets.

### **Internet usage:**

Our corporate [internet connection is primarily for business](#). But, you can occasionally use our connection for personal purposes as long as they don't interfere with your job responsibilities. Also, we expect you to temporarily halt personal activities that slow down our internet connection (e.g. uploading photos) if you're asked to.

You must not use our internet connection to:

- Download or upload obscene, offensive or illegal material.
- Send confidential information to unauthorized recipients.
- Invade another person's privacy and gain access to sensitive information.
- Download or upload pirated movies, music, material or software.
- Visit potentially dangerous websites that can compromise our network and computers' safety.
- Perform unauthorized or illegal actions, like hacking, fraud or buying/selling illegal goods.

## Cell phone:

We allow [use of cell phones at work](#). But, we also want to ensure that your devices won't distract you from your work or disrupt our workplace. We ask you to follow a few simple rules:

- Use your cell phone in a manner that benefits your work (business calls, productivity apps, calendars.)
- Keep personal calls brief and use an empty meeting room or common area so as not to disturb your colleagues.
- Avoid playing games on your phone or texting excessively.
- Don't use your phone for any reason while driving a company vehicle.
- Don't use your phone to record confidential information.
- Don't download or upload inappropriate, illegal or obscene material using our corporate internet connection.

Also, you must not use your phone in areas where cell phone use is explicitly prohibited (e.g. Factory Area.)

## Corporate email:

Email is essential to our work. You should use your [company email](#) primarily for work, but we allow some uses of your company email for personal reasons.

- **Work-related use.** You can use your corporate email for work-related purposes without limitations. For example, you can sign up for newsletters and online services that will help you in your job or professional growth.

- **Personal use.** You can use your email for personal reasons as long as you keep it safe, and avoid spamming and disclosing confidential information. For example, you can send emails to friends and family and download ebooks, guides and other safe content for your personal use.

## Our general expectations:

No matter how you use your corporate email, we expect you to avoid:

- Signing up for illegal, unreliable, disreputable or suspect websites and services.
- Sending unauthorized marketing content or emails.
- Registering for a competitor's services, unless authorized.
- Sending insulting or discriminatory messages and content.
- Spamming other people's emails, including your coworkers.

In general, use strong passwords and be vigilant in catching emails that carry malware or phishing attempts. If you are not sure that an email you received is safe, ask our [*Security Specialists.*]

## Social media:

We want to provide practical advice to prevent careless use of [social media in our workplace](#). We address two types of social media uses: using personal social media at work and representing our company through social media.

### Using personal social media at work:

You are permitted to access your personal accounts at work. But, we expect you to act responsibly, according to our policies and ensure that you stay productive. Specifically, we ask you to:

- **Discipline yourself.** Avoid getting sidetracked by your social platforms.
- **Ensure others know that your personal account or statements don't represent our company.** For example, use a disclaimer such as "opinions are my own."

- **Avoid sharing intellectual property (e.g trademarks) or confidential information.** Ask your manager or Compliance Department first before you share company news that's not officially announced.
- **Avoid any defamatory, offensive or derogatory content.** You may violate our company's anti-harassment policy if you direct such content towards colleagues, clients or partners.

## **Representing our company through social media:**

If you handle our social media accounts or speak on our company's behalf, we expect you to protect our company's image and reputation. Specifically, you should:

- Be respectful, polite and patient.
- Avoid speaking on matters outside your field of expertise when possible.
- Follow our confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism and fair use.
- Coordinate with our [PR/Marketing department] when you're about to share any major-impact content.
- Avoid deleting or ignoring comments for no reason.
- Correct or remove any misleading or false content as quickly as possible.

## **Conflict of interest:**

When you are experiencing a [conflict of interest](#), your personal goals are no longer aligned with your responsibilities towards us. For example, owning stocks of one of our competitors is a conflict of interest.

In other cases, you may be faced with an ethical issue. For example, accepting a bribe may benefit you financially, but it is illegal and against our business code of ethics. If we become aware of such behaviour, you will lose your job and may face legal trouble.

For this reason, conflicts of interest are a serious issue for all of us. We expect you to be vigilant to spot circumstances that create conflicts of interest, either to yourself or for your direct reports. Follow our policies and always act in our company's best interests. Whenever possible, do not let personal or financial interests get in the way of your job. If you are experiencing an ethical dilemma, talk to your manager or HR and we will try to help you resolve it.

## **Employee relationships:**

We want to ensure that relationships between employees are appropriate and harmonious. We outline our guidelines and we ask you to always behave professionally.

## **Fraternization:**

[Fraternization](#) refers to dating or being friends with your colleagues. In this policy, “dating” equals consensual romantic relationships and sexual relations. Non-consensual relationships constitute sexual violence and we prohibit them explicitly.

## **Dating colleagues:**

If you start dating a colleague, we expect you to maintain professionalism and keep personal discussions outside of our workplace.

You are also obliged to respect your colleagues who date each other. We won't tolerate sexual jokes, malicious gossip and improper comments. If you witness this kind of behavior, please report it to HR.

## **Dating managers:**

To avoid accusations of favoritism, abuse of authority and sexual harassment, supervisors must not date their direct reports. This restriction extends to every manager above an employee.

Also, if you act as a hiring manager, you aren't allowed to hire your partner to your team. You can refer them for employment to other teams or departments where you don't have any managerial or hiring authority.

## **Friendships at work:**

Employees who work together may naturally form friendships either in or outside of the workplace. We encourage this relationship between peers, as it can help you communicate and collaborate. But, we expect you to focus on your work and keep personal disputes outside of our workplace.

## Employment of relatives:

Everyone in our company should be hired, recognized or promoted because of their skills, character and work ethic. We would not like to see phenomena of nepotism, favoritism or conflicts of interest, so we will place some restrictions on [hiring employees' relatives](#).

To our company, a "relative" is someone who is related by blood or marriage within the third degree to an employee. This includes: parents, grandparents, in-laws, spouses or domestic partners, children, grandchildren, siblings, uncles, aunts, nieces, nephews, step-parents, step-children and adopted children.

As an employee, you can refer your relatives to work with our company. Here are our only restrictions:

- *[You must not be involved in a supervisory/reporting relationship with a relative.]*
- *[You cannot be transferred, promoted or hired inside a reporting relationship with a relative.]*
- *[You cannot be part of a hiring committee, when your relative is interviewed for that position.]*

If you become related to a manager or direct report after you both become employed by our company, we may have to *[transfer one of you.]*

## Workplace visitors:

If you want to invite a [visitor to our offices](#), please ask for permission from our *[HR Manager/ Security Officer/ Office Manager]* first. Also, inform our *[reception/ gate/ front-office]* of your visitor's arrival. Visitors should sign in and show identification. They will receive passes and will be asked to return them to *[reception/ gate/ front-office]* once their visit is complete.

When you have office visitors, you also have responsibilities. You should:

- Always tend to your visitors (especially when they are underage.)
- Keep your visitors away from areas where there are dangerous machines, chemicals, confidential records or sensitive equipment.
- Prevent your visitors from proselytizing your colleagues, gathering donations or requesting participation in activities while on our premises.

Anyone who delivers orders, mail or packages for employees should remain at our building's reception or gate. If you are expecting a delivery, *[front office employees/ security guards]* will notify you so you may collect it.

## **Solicitation and distribution:**

Solicitation is any form of requesting money, support or participation for products, groups, organizations or causes which are unrelated to our company (e.g. religious proselytism, asking for petition signatures.) Distribution means disseminating literature or material for commercial or political purposes.

[We don't allow solicitation](#) and distribution by non-employees in our workplace. As an employee, you may solicit from your colleagues only when you want to:

- Ask colleagues to help organize events for another employee (e.g. adoption/birth of a child, promotion, retiring.)
- Seek support for a cause, charity or fundraising event sponsored, funded, organized or authorized by our company.
- Invite colleagues to employee activities for an authorized non-business purpose (e.g. recreation, volunteering.)
- Ask colleagues to participate in employment-related activities or groups protected by law (e.g. trade unions.)

In all cases, we ask that you do not disturb or distract colleagues from their work.

## **Disciplinary actions:**

Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behavior.



## **Collaboration:**

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

## **Communication:**

All employees must be open for communication with their colleagues, supervisors or team members.

## **Benefits:**

We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.

## **Policies:**

All employees should read and follow our company policies.

If any employee has any questions, they should ask their managers or Human Resources (HR) department.

## **Compliance with law:**

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

## **Monitoring and evaluation of the Policy:**

This Policy will be reviewed by the Management from time to time and if required, modify the same in order to comply with the statutory requirements and also to incorporate the best industry practices.