



NANA CODE OF CONDUCT

Meaning Conduct is a set of rules outlining the social norms, religious rules and responsibilities of and or proper practice for an individual

Code of conduct is important in order to make conducive culture in the NANA. Senior leaders must manifest ethics in attitude and behavior. The employees of NANA must be well trained in implementing the right conduct in their professional work and behavior.

4.1 NANA Code of conduct Policy

- a. **Objective:** The objective of code of conduct policy is to make sure that NANA code of conduct is followed in all its activities. NANA is meant to form a work environment which is free from any kind of discrimination. It is also meant to make employees aware of corporate code of conduct which is expected from all employees of NANA.
- b. **Purpose:** The purpose of this policy is to lay down rules and regulations regarding code of ethics and professional conduct so as to maintain the trust of employees in NANA and to increase transparency which in turn help bring good name to it. This model code of conduct is planned to focus the employees on the fields related to any risk related to ethics, and to provide them with a solution which helps to deal with such issue and to help them build a culture of transparency and honesty.
- c. **Eligibility:** This Policy applies to all employees of NANA.

4.2 WHAT IS CODE OF ETHICS?

A code of ethics document tells about the mission and values of NANA. It also tells about the kind of problems faced by employee's related to ethical issues and possible ways to address the ethical issues.

4.3 CLAUSES COVERED UNDER THE POLICY

a. Conflict of Interest: The employees are supposed to work at all times in NANA's interest. There should not be any conflict where in employee personal or professional interest interferes with the interest NANA. Employees are expected not to involve themselves in any other business or activity which may affect their working in NANA.

- i. A situation of conflict arises when an employee personal interest are interfering with his workings for NANA. Conflict of interest may also occur when an employee misuse his powers to receive improper personal benefits.
- ii. Conflict of interest may also occur when an employee is involved in double employment or accepting gifts of very high value for personal gains which may create a situation of conflict of interest.

b. Respectability: It means the employee is following the code of conduct in the workplace. It includes their obedience towards the personal behavior which is expected from an employee in their work and interpersonal skills.

c. Privacy: As per professional code of ethics an employee is supposed to keep the confidential information private. Due to employee position in NANA they may come across some private and confidential information which is meant not to be shared with anyone inside or outside NANA. Some undertaking regarding this must be filled in at the time of joining. Such information can be shared only when permitted by the senior management to do so.

d. Privacy of financial particulars: NANA is supposed to disclose it's financial as per the accounting principle rules and regulations. All records of NANA must clearly reflect its transactions.

e. Cheating: Any kind of cheating as per the code of ethics definition is not allowed within NANA. The following will be considered as an act of cheating:

- i. Claiming reimbursement on false expense report
- ii. Using company assets for personal gains
- iii. Illegal transactions
- iv. Double employment
- v. Sharing wrong data in NANA records for accounting purpose
- vi. Sharing of confidential information
- vii. Unfair dealings
- viii. Non-compliance with NANA's rules and regulations
- ix. Documents forgery
- x. None reporting of illegal or unethical behavior.

4.4 Safety and security of NANA's property:

As per the code of conduct of employees they are required to maintain NANA's property with utmost care. Employees are responsible for keeping safe NANA's property from any misuse, theft or any other act that result in the loss of property. The clause is also applicable in case of inventions and patents. It is also not allowed to dispose of any of the organization property for personal gains.

4.5 Involvement in another business or employment:

According to NANA code of conduct an employee is suppose not to be engaged or interested in any other business or employment. All employees are supposed to devote their time and efforts to promote the project they are working for.

- a. **Harassment:** Any kind of harassment on account of age, sex, religion, race, caste, physical disability, marital status, gender is strictly prohibited. Employees are responsible to take all necessary actions and steps in term of support or preventive actions. This is as per the code of conduct at work.
- b. **Documents withholding:** All the documents related to senior management must be taken care of as per the documents policy. Documents should not be destroyed as they might be used for any future cause. Any document which is to be destroyed must be approved by senior management. This is according to the code of conduct in workplace.
- c. **Alcohol or illegal substance use:** All the employees are to be informed that use of alcohol or any other substance like illegal drugs etc is strictly prohibited.
- d. **Presents and Other profit:** As per the code of ethics example an employee must not accept or give any presents or gifts which might affect NANA's decision. Any exchange of gifts with outsiders, suppliers is strictly prohibited. Any kind of direct or indirect bribe or inducements are not allowed. Any such acceptance will be the violation of code of conduct.
- e. **Abiding to the law, rules and regulations:** No inside trading of any kind is allowed within NANA. Each employee of NANA must abide to the rules and regulations of the organization.
- f. **Reporting mechanism for unethical or illegal behavior:** All unethical or illegal behavior must be reported to supervisor or senior management. In case employee is uncomfortable sharing it with supervisor or senior management in that case employee might drop it in the reporting box.
- g. **Job responsibility and control:** As per the code of conduct at work employees must do their job with integrity and honesty. Supervisors and managers must have proper control over the power assigned to them. In no case they are allowed to misuse it on their subordinates. Both managers and their subordinates to work in collaboration.
- h. **No Retaliation:** According to NANA code of conduct their must not be retaliation against the employee who raises against any wrongdoing within NANA. Any such act will be the violation of code of conduct. Raising a concern cannot be the basis of adverse employment.
- i. **Compete Fairly:** There should not be any deception or abuse of confidential information to have an edge over the competitor.
- j. **Career Opportunity:** According to NANA code of conduct for employees no employee is allowed to use any opportunity arising due to working within NANA at higher position or using information for personal gains. No competing is allowed within NANA.

- k. **Anti-bribery and money laundering:** As per NANA code of ethics no employee is allowed to bribe anyone inside or outside NANA. No bribe is allowed to be offered to any official for any reasons and for sake of unfair advantages. Money laundering is strictly prohibited within NANA.
- l. **Environment & Sustainability:** NANA's code of conduct policy gives equal importance to environment protection and sustainability. NANA gives our best to preserve the environment. Regular education is given to our employees regarding environment conservation.
- m. **Failure to comply with code of conduct:** Any failure to comply with code of conduct must be dealt with strict punishment which might include loss of service or termination.
- n. **Revision of the policy: NANA** reserves the right to revise, modify any or all clauses of this policy depending upon demand.
- o. **Explanation of the policy: NANA** HR unit will be sole authority to interpret the content of this policy.