

CODE OF CONDUCT

Version 3.0

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1. INTRODUCTION

AEL Data expects its staff to be scrupulously impartial and honest in all affairs relating to the Company and their job within it. All staff also bears a responsibility as employees to act as representatives for the Company in terms of their general conduct both within and outside the organisation. This policy outlines the responsibilities of staff working for the Company.

Under Common Law the duties of an employee are as follows:

- to be ready and willing to work;
- to offer their services personally: for example must not subcontract the work for which they are employed;
- to take reasonable care in the exercise of that service, including the duty to be competent at work and to take care of the Company's property;
- to not willfully disrupt the Company's business;
- to obey reasonable orders as to the time, place, nature and method of service;
- to work only for the Company in the Company's time;
- to disclose information to the Company relevant to the Company's business: for example that they might know or discover;
- to hold solely for the Company the benefit of any invention relevant to the business on which the Company is engaged;
- to respect the Company's trade secrets;
- in general, to be of good faith and do nothing to destroy the trust and confidence necessary for employment;
- to account for all benefits - monetary or in kind - received in the course of employment;
- to not give or receive bribes or otherwise act corruptly
- to indemnify the employer for loss caused by the employee.

2. STANDARD OF CONDUCT REQUIRED BY THE COMPANY

1) Bribery and Other Corrupt Behaviour

The Company has a strict anti-bribery and corruption policy in line with the Bribery Act (2010). A bribe is defined as: giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

If an employee bribes (or attempts to bribe) another person, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of the company's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances the employee will be subject to formal investigation under the Company's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

Gifts and Hospitality

Giving Gifts:

- Giving Gifts or Business Amenities/Entertainment of value up to the Acceptable Limit.
- Other reasonable and Customary Gifts and Entertainment within the Acceptable Limit
- Giving promotional items within the above value, such as pens, diaries and calendars

Accepting Gifts:

- Receiving Gifts of up to Acceptable Limit.
- Receiving Customary Gifts and Entertainment when it is customarily offered to a Group including you.
- Mementos for participating in a conference as a guest speaker or attendees up to Acceptable Limit.
- Awards, rewards by customers given based on employee's performance and work recognition of any value.
- Sweets, chocolates and other perishables. In case the value is less than the Acceptable Limit, employee can use it as he desires. But if the value is above the Acceptable Limit, it is advisable that

2) Transaction of Private Business

Employees having official dealings with contractors and other suppliers of goods or services must avoid transacting any kind of private business with them by any means other than the Company's normal commercial channels. No favour or preferences as regards price, or otherwise, which is not generally available, should be sought or accepted.

3) Visits to Conferences, Demonstrations etc

The Company intends that when it is necessary for employees to visit conferences, demonstrations and similar occasions, it should bear the travelling and subsistence expenses itself. Exceptions to this general rule will only be permitted with the approval of the CEO/CISO.

4) Attendance at Luncheons, Receptions etc

Where it is evident that the work of the Company will be facilitated, invitations to attend receptions, luncheons may be accepted under the following rules:

- no employee may accept an invitation without first obtaining the approval of the Departmental Manager;
- in exceptional circumstances, where it is not possible to seek prior approval, the facts should be reported immediately afterwards;
- if addressed personally, such an invitation may not be transferred to another employee, except with the consent and approval of a senior manager as above and with the concurrence of the party issuing the invitation;
- invitations involving attendance outside normal working hours may be accepted only on the authority of the Departmental Manager;
- as a general rule, any officer who has any doubts about the wisdom of accepting any hospitality should decline the offer.

NB: The important difference between, for example, attendance in an official capacity at a function organised by the Company or one of its subsidiaries and the acceptance of hospitality from a private individual or firm should be recognised.

Nothing more than a small, low value item such as a calendar, diary, blotter, chocolates or flowers can be accepted. All other gifts must be politely refused or, if received through the post, returned to the donor with a suitably worded letter signed by the Department Manager.

5) Identification

Employees should wear or carry their identity badges whilst carrying out their duties.

6) Confidentiality

At all times confidentiality must be maintained. No information can be released to unauthorised persons or organisations. The CEO/CISO or other Senior Managers of the Company will inform employees of those authorised to receive information.

If doubt exists as to the validity of an organisation or individuals to receive information, this must be checked with a Senior Manager.

7) Political and civic activities

It is not the intention of AEL Data, or this policy, to dissuade employees from participating actively in public duties. It is important, however, that by doing so there is no suggestion to a third party that the employee is acting on behalf of, or with the support of, AEL Data. To avoid any misunderstanding, no Company employee should permit his or her company affiliation to be noted in any outside organisation's materials or activities without the express written approval of a member of top management.

8) Policies of Environment

In order to ensure that AEL Data facilities are properly secured, security controls are to be implemented for all facilities. Access Controls include a minimum of locked doors to access the facility, except in those facilities where a security guard is available to provide a buffer for access to the work spaces.

In addition to the access controls defined, facilities which are required to meet AEL Data server room standards for a development environment, including but not limited to the following:

- Environmental controls and appropriate measures
- Cabling access, routing and security
- Rodent & Pest control activities
- Recycling of E-Wastes
- Twenty-four hour environmental monitoring controls
- Power supply UPS/Back-up generator
- Air conditioning
- Fire & Safety Measures
- Safe Drinking Water
- Minimize the use of paper in the company
- Isolation of data center areas from delivery and loading areas

a) Workspace Environmental Security

Employees are responsible for the security of their workspace. AEL Data provides locked storage at all facilities for personal valuables and company property. Employees should ensure that Confidential Information in their area such as papers, reports, printouts, data media, whiteboard drawings are secured when left unattended.

Educate our employees and contractors on their environmental responsibilities and ensure this is integrated into their work practices, training and decision making.

b) Paper Usage

AEL Data Facilities & Employees are responsible for minimise the use of paper in the company; AEL Data management is responsible to reduce the packaging as much as possible. AEL Data policy is to buy recycle and recyclable paper products. And also AEL Data will reuse and recycle all paper where possible.

c) Energy and Water

AEL Data seeks to reduce the amount of energy used as much as possible. AEL Data premises Lights and electrical equipment will be switched off when not in use. AEL Data will seek to buy more environmentally friendly and efficient products.

d) Maintenance and Cleaning

AEL Data Facilities provides cleaning materials will be as environmentally friendly as possible and Materials used in office refurbishment will be as environmentally friendly as possible. AEL Data will only use licensed and appropriate organisations to dispose of waste. AEL Data will minimise waste by evaluating operations and ensuring they are as efficient as possible.

e) Monitoring and Improvement

AEL Data facilities will comply with and exceed all relevant regulatory requirements. AEL Data will continually improve and monitor environmental performance. And also AEL Data will continually improve and reduce environmental impacts. AEL Data will incorporate environmental factors into business decisions. AEL Data Management will Increase employee awareness through training.

9) Human Rights

AEL Data supports and practices its Human Rights Policy by:

- equal opportunity for employees in all grades, independently of skin color, race, gender, sexual identity, age, ethnicity, nationality, sexual orientation, marital status, disability or any other characteristics protected under the law;
- a secure and healthy workplace where human health and the environment are protected;
- the payment of employee compensation that will respect local laws being fair according to the employee's skills and the function to be performed in the Company, in addition to providing opportunities to improve their competencies and skills;
- respect for employees' right to legal association; and
- co-operation with governments and communities where we do business, so as to improve the level of education, culture, economy, and social welfare of these communities.

10) Policy on Freedom of Association

AEL Data respects the legal rights of its employees to form and join or to refrain from joining trade unions as guaranteed under the applicable legislations. It is AEL Data's expectation that its suppliers would also do the same. AEL Data always encourages and promotes favourable employment conditions to promote positive relationships between employees and managers, to facilitate employee communications, and to support employee development.

11) Policy on abolition of forced labour

AEL Data strictly prohibits forced or compulsory labour. AEL Data is committed to ensuring that employees enter into employment and stay on in AEL Data out of their own free will. There is no forced, bonded or involuntary prison labour. Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice. AEL Data also insists that its suppliers prohibit forced labour or other compulsory labour in any of their operations.

12) Policy on elimination of child labour

AEL Data's policy is not to support child labour. AEL Data is committed to implementing the provisions of the Child Labour (Prohibition and Regulation) Act, 1986. AEL Data is aware of social reality of the existence of child labour and recognizes that this evil cannot be eradicated by simply setting up rules or inspections. Towards this end, AEL Data is committed to work in a pro-active manner to eradicate child labour by actively contributing to the improvement of children's social situation. To promote this, AEL Data encourages its suppliers also to work towards a no child-labour policy.

As part of its efforts to eliminate the evil of child labour, AEL Data encourages the employment of the parents of such children to secure the existence of the family and the education of the children.

1. If Child is detected at person who identifies has to inform HR Department.
2. HRD verifies that the child is underage with documentary Proof, If available.
3. Stop him/her work, provide food and take the child to a safer place
4. If the child is found hired by our contractors, Supplier, Transporter the following steps are carried out:
 - (a) Once again emphasize that as a part of AEL Policy it is already communicated and accepted by them in Code of Conduct not to employ any child so no child is to be hired.
 - (b) To tell contractor, Supplier, Transporter to discuss with the child about his family background etc & if possible discuss with the parents about their financial background and necessary support of Education may be given after discussion with HR.

13) Wages and Benefits

AEL Data pays applicable legal wages under humane conditions. All workers are provided with clear, written information about their employment conditions with respect to wages before they enter employment and as needed throughout their term of employment. Deductions from wages as a disciplinary measure will not be permitted nor will any deductions from wages not provided for by national law or local law be permitted without the express, written permission of the worker concerned. All disciplinary measures should be recorded. Wages and benefits paid for a standard working week must meet, at a minimum, local and national legal standards.

14) Hours of Work

Except in extraordinary business circumstances, employees shall not be required to work more than the lesser of 60 hours per week or the limits on regular and overtime hours allowed by the law of the country. Employees shall be entitled to one day of rest in every 7-day period.

15) Overtime Compensation

In addition to their compensation for regular hours of work, employees shall be compensated for overtime hours at the same rate as their regular salary. However, AEL Data is reviewing this in accordance with ETI revised the working hours clause in its code of labour practice and will offer overtime premium that is 125% of their normal hourly wage, by December 2014 which is the recommended adoption date.

16) Health, Safety and Security

AEL Data shall strive to provide a safe and healthy working environment and comply, in the conduct of its business affairs, with all regulations regarding the preservation of the environment of the territory it operates in. AEL Data shall be committed to prevent the wasteful use of natural resources and minimise any hazardous impact of the development, production, use and disposal of any of its products and services on the ecological environment.

AEL Data's mission is to create superior value for our stakeholders. The health and safety of our employees is of paramount importance. AEL Data's concern for them is not only good corporate citizenship, it's also good business.

AEL Data is committed to a continuously improving Health & Safety Management System. Strict compliance with applicable regulations is considered a minimum standard - neither production goals nor financial objectives shall excuse non-compliance.

The core values of AEL Data's Health & Safety Management Systems are to:

- Create, maintain and promote a safe and healthful workplace for all employees.
- Comply with the intent as well as the letter of all relevant regulations at the Union State and local levels.

- Set goals and objectives and measure progress toward them. Prevent accidents and minimize environmental impacts.
- Encourage our contractors and suppliers to adopt standards similar to our own.

These core values build on our tradition of quality, innovation, and continuous improvement. Each employee is personally responsible for making these values a part of everyday work life at AEL Data.

- **Safety Policy:** It is the policy of AEL Data to ensure the health, safety and welfare at work of all its staff
- **Responsibility:** The overall responsibility for safety within AEL Data rests with the CEO. Implementation of this responsibility has been delegated as follows:
 - The designated Safety Officer is responsible for Health and Safety, the fire alarm system, annual fire drill practices, the provision of First Aid services throughout the building, and training on health and safety issues.
 - The Safety Officer may also, at his discretion, delegate particular aspects of the implementation of his duties to others.
 - **Monitoring:** Health and Safety issues are subject to continual review and monitoring. Additionally, safety inspections of all parts of AEL Data are conducted annually to review, highlight and assess potential risks.
 - **Responsibility:** Whilst it is AEL Data's responsibility to ensure, so far as possible, a safe working environment, safe working practices and adequate training, it is the responsibility of all staff, contractors and visitors in the premises to care for their own safety and the safety of others. This includes, but is not limited to: Maintaining safe working practices.
 - Identifying possible hazards and bringing these promptly to the attention of those responsible.
 - Undertaking any necessary safety.
 - Being familiar with appropriate emergency procedures including knowledge of: i. appropriate escape routes; ii. location of fire extinguishers; iii. the emergency services number; iv. how to summon a Paramedic.
- **Accidents:** All accidents or 'near misses' should be reported, whether or not they involve personal injury.
- **Fire Alarm:** On hearing the fire alarm, all personnel must evacuate the building by the nearest designated safe exit, closing (but not locking) any doors. They should proceed to the designated assembly point and not re-enter the building until the Fire Brigade or Safety

Officer gives the 'all clear'.

- In the case of fire, the alarm should be activated using the nearest accessible fire call point. Fire extinguishers are available for use if the fire is small and its spread can be easily contained without risk to personal safety. All staff must Familiarise themselves with the instructions on the fire extinguishers. If in any doubt, no must be made to attempt to fight the fire.
- Four hours of fire resistance for storage repositories including all doors and the protection of openings (e.g. Auto fire dampers in air conditioning ductwork). Fire extinguishers and Fire auto sprinkler are fixed as fire suppression equipment in the workplace environment. Automatic fire suppression system.
- 24 hour smoke detectors linked to the fire station or security agency.
- Buildings are waterproof construction and Water services will not pass through the storage area
- Configured an alarm system that consists of both visual and audible signals (bells, sirens, whistles, blinking lights).
- AEL Data will hold the hard copies in Tamper Proof Cabinets (with Alarm) to preclude theft, unauthorised access, copying, alteration, substitution, disclosure or damage.
- The entry system in the facility is of solid construction to which only controlled access is possible. These facilities are equipped with CCTV and intruder detection systems.
- Access shall be available to authorised personnel only by means of biometric access control Standards and conformity assessment processes must be identified and adopted for AEL Data.
- Electrical equipment is checked on purchase and regularly inspected, tested where appropriate, and maintained throughout its working life. Electronic equipment and computers is visually inspected every 2 years, other portable equipment subject to high usage is tested every year, Air conditioners are visually inspected every year and tested every 3 years
- Appliances: Stoves Kettles, heaters and other similar appliances must not be used in offices
- Plugs and cables: Access to plugs and network ports must be kept free. Cables should be kept neat and routed so as to prevent entanglement. Multi-plug adapters should not be used. Extension reels must be fully unwound when in use.
- Offices: Offices must be kept reasonably tidy and uncluttered to allow cleaning and easy egress in the case of emergency. Corridors should be kept free of obstruction.

- Storage: Shelves must not be overloaded, and must be fitted with bookends fixed to the wall, where appropriate, to prevent heavy items falling on occupants. A ladder or 'step stool' should be used to gain access to high shelves: you must not climb on desks or chairs. Rubbish, loose paper and other flammable material must not be allowed to accumulate due to the fire risk.

Environment performance and Corporate Social Responsibility is an integral part of our “Spirit”. To accomplish this, we will;

- comply with all applicable environment and related laws, regulations, codes of practices and other requirements
- take appropriate measures to identify, assess and manage the environment impacts of our existing and planned operations
- drive ecological sustainability in every dimension through carbon consumption foot print reduction, Positive water balance, Sustainable Waste management and preserving bio diversity.
- Build active and long term partnerships with the communities in which we operate to improve condition of the most disadvantaged amongst them
- Conduct business that achieves a balance or integration of economic, environmental and social imperatives while at the same addressing stakeholder expectations.
- The company would also not treat these activities as optional ones, but would strive to incorporate them as an integral part of its business plan. The company would also encourage volunteering amongst its employees and help them to work in the communities.

As regards Health & Safety, AEL Data promotes employee well-being as a strategic value and fundamental component in its success and is considered more than a traditional occupational health and safety. AEL Data takes appropriate measures to prevent workplace injuries and ill health and to provide employees with a safe and healthy working environment by considering evolving industry practices and societal standards of care. AEL Data assesses and manages the Health and Safety impacts and eliminate unreasonable risks of its existing, new activity or project, design and production of products & services.

All employees have the right and responsibility to stop any work they feel may be unsafe. Employee can notify their manager, or Environmental and Safety Committee immediately about any unsafe equipment, or any situation that could pose a threat to health or safety or damage the environment.

Principal Components of Employee Wellness Procedure

Domain	Approach	Activity
Prevention	<ul style="list-style-type: none"> • Workplace risk assessment 	<ul style="list-style-type: none"> • Eye check-up • General Body check-up
Management	<ul style="list-style-type: none"> • Regular performance review meetings • Review jobs / responsibilities • Regular team meetings • Monitoring development and training, with personal development plans 	<ul style="list-style-type: none"> • Advising and taking appropriate action where necessary for issues such as attendance, work performance, accidents at work, sickness
Training	<ul style="list-style-type: none"> • Managing staff performance • Performance review • Introduction to management and health and safety issues 	<ul style="list-style-type: none"> • Health and safety issues Ergonomics • First aid • Risk management
Support	<ul style="list-style-type: none"> • Professional counselling • Helpline services • Professional medical advice • Professional work related advice • Leave • Grievance redressal 	<ul style="list-style-type: none"> • Providing avenues for relaxation • Preventing stress • Stress awareness • Learning to cope with stress Managing stress • Providing information on employee well - being • Encouraging informal and formal support systems

Organisational approaches:

Provide effective management and leadership

- Clear chain of command
- Available and accessible supervisors
- Effective time management

Define clear purpose, goal and roles for employees

Provide proper orientation Nurture team work

Develop peer support networks

Develop a plan for stress management

- Educate employees about stress management/prevention
- Mechanisms to identify stress
- Stress prevention (break from high stress jobs, adequate breaks from work, avenues for help within the organisation, networking with outside agencies to provide help and counselling, both for stress and mental disorders)

Individual approaches:

Manage workload

- Time management
- Effective workload-

management Develop a balanced

lifestyle

- Proper diet
- Avoid junk food, caffeine, tobacco, alcohol
- Adequate exercise
- Adequate sleep and rest

Develop affiliations (social, societal,

spiritual) Keep contact with social supports

Stress reduction techniques

- Relaxation, deep breathing, yoga, meditation
- Recreation (music, other entertainment, exercise, time with family and friends)

- Have confidantes and open up emotionally Practice self-awareness
- Learn to recognize early symptoms of stress Accept that you may need help
- Examine personal prejudices and cultural stereotypes

The wellness committee oversees the wellness program and helps carry it out. The committee should support employees in making healthy choices with their work and home lives. The committee encourages the Habit of wellness, Increase Awareness of factors and resources contributing to well-being, Inspire Individuals to take responsibility for their own health. The mission of the Wellness Committee is to inspire, create and maintain a workplace and environment that supports each person's healthy lifestyle choices.

17) Shareholders

AEL Data is committed to enhance shareholder value and comply with all regulations and laws that govern shareholders' rights. Vendor Manager shall duly and fairly inform its shareholders about all relevant aspects of the company's business.

18) Protecting Company Assets

All employees are responsible for safeguarding the tangible and intangible assets of AEL Data and shall seek to protect AEL Data's assets from misuse, theft, fraud or damage or loss. Assets include physical property, intellectual property of AEL Data or client, electronic communication devices like computers, software applications, internet and intranet connections, teleconferencing/video conferencing facilities, facsimiles, telephones, PDAs and other electronic communication devices and facilities for email, voice mail, SMS/text messages, instant messaging and all other proprietary and confidential information of AEL Data.

Misappropriation or unauthorized disclosure of AEL Data's assets is a breach of employee's duty to AEL Data.

19) Personal or sexual harassment

AEL implements and integrates a strict policy that makes employment discrimination of any type unacceptable in our workplace. We train our managers in the implementation of the anti-discrimination policy with the expectation that prevention is their responsibility. Cost-effective online training solutions are available for portions of this employee training. All employees must sign off on a training record and to indicate that they are aware of and understand the employer's policy and complaint process. We encourage cooperation and equality in the workplace by creating diverse work groups and departments throughout the company. We have set up a way that employees can report

discrimination to human resources manager or Prevention of Sexual Harassment committee.

Personal harassment means any conduct whether verbal or physical that is discriminating in nature, based upon another person's race, color, ancestry, place of origin, political beliefs, religion, marital status, physical or mental disability, sex, age or sexual orientation. It is discriminatory behavior, directed at an individual that is unwanted or unwelcome and causes substantial distress in that person and serves no legitimate work-related purpose.

Sexual harassment is any conduct, comment, gesture or contact of a sexual nature that one would find to be unwanted or unwelcome by any individual, or that might, on reasonable grounds, be perceived by that individual as placing a condition of sexual nature on an employment or career development.

AEL Data has a zero tolerance policy with respect to Personal /Sexual Harassment. Personal/Sexual Harassment in any form is strictly prohibited and an employee with immediate termination/dismissal for just cause without notice or pay in lieu of notice.

20) Investigations of Suspected Violations

All reported violations will be promptly investigated and treated confidentially to the extent reasonably possible. It is imperative that reporting persons not conduct their own preliminary investigations. Investigations of alleged violations may involve complex legal issues, and acting on your own may compromise the integrity of an investigation and adversely affect both you and the Company.

21) Discipline for Violations

The Company intends to use every reasonable effort to prevent the occurrence of conduct not in compliance with its Code and to halt any such conduct that may occur as soon as reasonably possible after its discovery. Subject to applicable law and agreements, Company personnel who violate this Code and other Company policies and procedures may be subject to disciplinary action, up to and including discharge.

22) General Conduct

Employees should at all times conduct themselves in such a way as to enhance the reputation of the Company.

AEL Data will support employees who become aware of and are willing to report breaches of this policy or who genuinely believe that a breach is occurring, has occurred or is likely to occur within the business. Employees should raise the issue internally with their manager or Environmental and Safety Committee or in accordance with the Company's Policy on Disclosing Information.

These standards of conduct are intended to underpin and clarify standards required by the Company of its employees and form a fundamental part of the employment contract. Staffs who fail to comply with the guidance detailed in this Policy could be subject, following full investigation, to

disciplinary action up to and including dismissal. If through their actions or omissions staffs are found to be in contravention of either this Policy or, indeed, their legal responsibilities then the Company reserve the right to take legal action if it deems it to be necessary to do so.