

# POLICY MANUAL

# 25

FOR ALL STAKEHOLDERS





**quadrafort**

OUTDO | OUTSHINE

# CODE OF CONDUCTS AND ETHICS MANUALS CONCERNING ALL STAKEHOLDERS



nasscom





Date

26.11.2024

Issued by

**Neha Sarpal**

Compliance Officer  
under the authority of  
Board of Directors  
Quadrafort Technologies Limited

Version

1.3

Signature

Our Company's Board is responsible for approving and issuing the Code. The Code was first effective on July 20, 2020, with revisions through November 28, 2022 and November 26, 2024 .

Our Code is reviewed annually to determine whether revisions may be required due to changes in the law or regulations, or changes in our business or the business environment. The Board of Directors must approve any changes to our Code.



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## A: EXECUTIVE SUMMARY

This comprehensive document serves as the ethical road map for Quadrafort, its employees, group companies and Suppliers and clients and other affiliates by which it conducts its businesses. It articulates the Group's values and ideals that guide and govern the conduct of our companies as well as our colleagues in all matters relating to business.



Quadrafort Technologies Limited, its subsidiaries, group companies and affiliates ("Quadrafort") is strongly committed in observing the highest ethical standards and integrity in all its procurement activities.

This Code of Conduct and policies define the clear standards for conduct and summary of Quadrafort's expectation from its Team members, Employees, Directors, Partners, Suppliers, Clients, Associates and their sub-contractors ("hereinafter referred to as "Parties" or "Persons") in all procurement dealings, ensuring that internationally recognized procurement ethics are followed (the "Code").

This model code of conduct of QUADRAFORT TECHNOLOGIES LIMITED is a commitment to adhere to standards of loyalty, honesty, integrity and avoidance of conflicting interest. It is an acknowledgement of duties and acceptance of responsibility to carry out duties in honest and professional manner and to oversee the assets and business affairs in the best interest and its stakeholders within the scope of authority conferred upon.

Quadrafort procurement ethics focuses on zero tolerance on corruption, avoiding any form of conflict of interest and honest representation of capabilities.

## B: DEFINITIONS



- (a) **Confidential Information** all material, non-public, business-related information, written or oral, whether or not it is marked as such, that is disclosed or made available to the receiving party, directly or indirectly, through any means of communication or observation.
- (b) **Conflict of Interest** shall include, but will not be limited to, instances where an Quadrafort employee or director may have an interest of any kind in the Supplier's business, whether through personal relationships, investments, directorships or any kind of economic ties with the Supplier or any such relationship whereby the Supplier is in a position to influence the concerned employee directly/indirectly.
- (c) **Procurement Activities** shall include staffing, products or services from Suppliers
- (d) **Relative** shall include immediate family and shall include children, parents, spouse, partner and sibling
- (e) **Sub-Contractors** an individual or (in some cases) a business that signs a contract to perform part or all of the obligations of another's contract.
- (f) **Human Trafficking** The recruitment, transportation, transfer, harbouring, or receipt of persons through force, fraud, or coercion for the purpose of exploitation.
- (g) **Forced Labor:** All work or service extracted from any person under the menace of penalty and for which the person has not offered themselves voluntarily.
- (h) **Child Labor:** Work that deprives children of their childhood, potential, dignity, and is harmful to their physical and mental development.
- (i) **Act** shall mean the Companies Act, 2013 and includes any amendment thereof, Prevention of Corruption Act, 1988 (as amended), Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act) , Prevention of Money Laundering Act (PMLA), 2002, Labour Laws-Factories Act, 1948, Shops and Establishments Act, Employees' Provident Funds and Miscellaneous Provisions Act, 1952, etc., emphasizing fair labour practices and workplace ethics, Compliance with the Environment (Protection) Act, 1986
- (j) **Arm's length transaction** means a transaction between two related parties that is conducted as if they were unrelated, so that there is no conflict of interest.
- (k) **Facilitation Payment** Small unofficial payments to expedite routine procedures, which are strictly prohibited.
- (l) **Ordinary course of business** means the usual transactions, customs and practices undertaken by the Company to conduct its business operations and activities and includes all such activities which the



company can undertake as per Memorandum & Articles of Association. All capitalized terms used in this Policy but not defined herein shall have the meaning assigned to such term in the Act and the Rules thereunder as amended from time to time.



(m) **Sexual harassment** may occur not only where a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an employee and someone that employee deals with in the course of his/her work who is not employed by the Company. "Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), but not limited to:

**1. Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:**

- (a) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit
- (b) Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation c. Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one's will
- (c) Demand or request for sexual favors
- (d) Sexually colored remarks or remarks of a sexual nature about a person's clothing or body

- (e) Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas
- (f) Showing pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc.
- (g) Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes
- (h) Giving gifts or leaving objects that are sexually suggestive
- (i) Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; Persistent watching, following, contacting of a person; and
- (j) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature



**2. The following circumstances if it occurs or is present in relation to any sexually determined act or behaviour amount to sexual harassment:**

- a) Implied or explicit promise of preferential treatment in employment;
- b) Implied or explicit threat of detrimental treatment in employment;
- c) Implied or explicit threat about the present or future employment status;
- d) Interference with the person's work or creating an intimidating or offensive or hostile work environment; or

- e) Humiliating treatment likely to affect health or safety.

An alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the people but on the experience of the aggrieved woman.

- (n) **Aggrieved woman:** In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- (o) **Complainant:** Any aggrieved woman who makes a complaint alleging sexual harassment under this policy.
- (p) **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman under this policy.
- (q) **Employee:** A person employed at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- (r) **Special Educator:** A Special Educator means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.
- (s) **Workplace:**
- Premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries which are controlled by the Company.
  - Places visited by the Employee arising out of or during the course of employment including official events, accommodation and transportation provided by the employer for undertaking a journey.
- (t) **Employer:** A person responsible for management, supervision and control of the workplace.
- (u) **Diversity:** The representation of different identities, including but not limited to race, ethnicity, gender, age, sexual orientation, disability, and cultural backgrounds.
- (v) **Equity:** Ensuring fair treatment, access, and opportunities for all individuals while working to identify and eliminate barriers.
- (w) **Inclusion:** Creating a work environment where everyone feels welcomed, respected, supported, and valued
- (x) **“we or us”** means our company, our executive directors, officers, employees and those who work with us, as the context may require.



## C: PURPOSE

Quadrafort engages with Parties who share our commitment to human rights and fair employment practices in accordance with existing international standards such as the:

- **Prevention of Corruption Act, 1988 (as amended)**
- **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act)**
- **Prevention of Money Laundering Act (PMLA), 2002**
- **Labour Laws**
- **Factories Act, 1948, Shops and Establishments Act, Employees' Provident Funds and Miscellaneous Provisions Act, 1952, etc., emphasizing fair labor practices and workplace ethics**
- **Compliance with the Environment (Protection) Act, 1986**
- **Global and Industry Guidelines**

Quadrafort operates globally and complies with applicable regulations, including but not limited to:

- **India: Companies Act, IT Act, Prevention of Corruption Act, POSH Act.**

- **European Union: General Data Protection Regulation (GDPR), Digital Services Act.**
- **USA: Communications Decency Act, Foreign Corrupt Practices Act (FCPA).**

This Code sets out how we behave with:

- our employees, or those who work with us;
- our customers;
- the communities and the environment in which we operate;
- our value-chain partners, including suppliers and service providers, distributors, sales representatives, contractors, channel partners, consultants, intermediaries and agents;
- our joint-venture partners or other business associates;
- our financial stakeholders;
- the governments of the countries in which we operate; and our group companies.

In this Code, "we or us" means our company, our executive directors, officers, employees and those who work with us, as the context may require.

## D: APPLICABILITY

1. This Code sets out how we behave with:

- our employees, or those who work with us;
- our customers;
- the communities and the environment in which we operate;
- our value-chain partners, including suppliers and service providers, distributors, sales representatives, contractors, channel partners, consultants, intermediaries and agents;
- our joint-venture partners or other business associates;

- our financial stakeholders;
- the governments of the countries in which we operate; and
- our group companies.
- The Directors, both executive and non-executive Directors
- Senior Management comprising of members of Management one level below the Executive director, including all functional heads.

## E: REPRESENTATION (COMPLIANCE WITH ALL THE REQUIREMENTS)

All concerned parties are expected to comply with all the applicable legal/statutory/regulatory requirements of the land without fail.

Quadrafort expects all its Persons to honestly declare and warrant that:

- i) It will comply with all rules, regulations and statutory requirements relating to the provision of the products/ services to Quadrafort.
- ii) It will not act in concert with other Persons or agents when participating in a bid.
- iii) It is a duly authorized/certified provider of the supplied products/services and shall not, expressly or impliedly hold itself out to be an agent/ representative of a third-party provider of the same products/services.
- iv) It will only supply products and/or services that are certified to be of merchantable and satisfactory quality.
- v) The Person possesses the necessary capabilities, equipment and suitable place of business to perform its obligations.
- vi) It shall not contract out or subcontract or outsource any portion of the products/services unless prior written consent from Quadrafort has been obtained; and
- vii) It shall always maintain the highest standards of integrity and quality of work.

## F: FAIR DEALING

Quadrafort is committed to free and open competition in the marketplace. Suppliers should avoid actions that could reasonably be construed as being anticompetitive, monopolistic, or otherwise contrary to laws governing competitive practices in the marketplace, including antitrust laws. Such actions include misappropriation and / or misuse of a competitor's confidential information or making false statements about the competitor's business and business practices.





## G: ANTI-BRIBERY & ANTI-CORRUPTION COMPLIANCE

**Quadrafort Technologies Limited** (the 'Company' or 'Quadrafort') practices a zero-tolerance approach to bribery and corruption and is committed to act professionally and fairly in all its business dealings and relationships and in implementing and enforcing effective systems to counter bribery and corruption in any form. Company mandates compliance with all applicable anti-bribery and anti-corruption laws in all markets and jurisdictions in which it operates.

Bribery is a serious criminal offence in India (Prevention of Corruption Act, 1988, Indian Penal Code, 1860) and other applicable laws where bribery offences can result in the imposition of severe fines and/or custodial sentences, exclusion from tendering for public contracts and severe reputational damage. Whoever we, as a Company or as individuals, may deal with, and wherever we may operate, we are committed to doing so lawfully, ethically and with integrity.

This Anti-Bribery and Anti-Corruption Policy (the 'Policy' or 'ABAC Policy') has been formulated and designed to provide a framework for ensuring compliance with various legislations governing bribery and corruption globally and provides guidance on the standards of behavior to which we must all adhere. The Company's commitment is to always act with integrity to ensure that we are trusted by our customers, colleagues, business partners, and the communities in which we operate. As part of this commitment, any form of bribery and corruption is not acceptable. We prefer foregoing business opportunities rather than paying bribes.

Quadrafort expects all contracted parties seeking to sell goods or services to conduct their business in accordance

with the highest ethical standards. Suppliers or potential Suppliers must strictly comply with all rules and regulations on bribery, corruption and avoid unacceptable business practices. Hence Suppliers and those acting on their behalf are expected to observe the following:

- i) Shall not, directly or indirectly, offer to any Quadrafort Representative/Staff money, goods or a service as a consideration or in expectation of a favorable decision, information, opinion, recommendation, vote or any other form of favouritism which qualifies as a corruption.
- ii) Shall not directly or indirectly, offer, give or agree or promise to give anything of value to any Quadrafort representative/staff, any gratuity or gift for the benefit of/or at the direction or request of any Staff of Quadrafort to improperly obtain new business or retain existing business.
- iii) To immediately inform [whistleblower@Quadrafort.com](mailto:whistleblower@Quadrafort.com) if any Representative / Staff of Quadrafort solicits or obtained or has tried to obtain gratification for himself/herself or for any other persons.
- iv) Quadrafort does not give or receive bribes, including facilitation payments
- v) Quadrafort is committed to conducting business holding highest standards of integrity and adhering to the letter and spirit of all the applicable laws and regulations of the locations where the Company operates.
- vi) Management of the Company including members of Board of Directors have adopted a 'zero tolerance' approach to/from any form of Corruption within the Company by setting personal example of ethical

attitude and ensuring compliance with applicable Anti Bribery and Corruption legislation and internal policies implemented by the Company, while executing their duties.

- vii) Quadrafort prohibits direct or indirect payment/ acceptance of bribe or any form of corrupt payment to any party for furtherance of business or to gain any Undue Advantage. Further, Employees are not permitted to pay any form of bribe indirectly on behalf of the Company or authorize any Third Party representing Quadrafort, to pay bribe on the behalf of the Company.
- viii) Bribery may not always be in the form of cash payments and may take many other forms, including gifts, hospitality, entertainment, political contributions, charitable donations, lobbying payments, sponsorships, employment opportunities, among others.
- ix) Facilitation Payments are also prohibited and must not be incurred by Employees or Third Parties either directly or indirectly on behalf of Quadrafort.



### Giving or receiving Gifts, Hospitality and Entertainment

Gifts, Hospitality and Entertainment given to or received from any Third Party who have a business relationship with the company are generally acceptable, if the gift is modest in value, appropriate to the business relationship, and does not create an appearance of impropriety. No cash or cash equivalent payments should be given or received.

In case of Public Officials, giving gifts is prohibited except for gifts during festive seasons such as Diwali, Christmas. Hospitality provided to Public Officials should be reasonable and should not influence or appear to

influence any business decision. Further, any form of entertainment to Public Officials is not permissible.



Prior to offering a permissible gifts, hospitality or entertainment to any Third Party including Public Officials, Employee should be in compliance with respect to the approval guidelines and value limits set by the company.

Donation and Sponsorship to political parties, individual candidates and Public Officials is prohibited.

Quadrafort does not offer donations or provide sponsorship to Public Officials.

Quadrafort is politically neutral, i.e., not directly or indirectly affiliated with any political party and does not provide services linked to any political messages. Quadrafort does not associate itself with any political party or independent candidate, and does not campaign for, support and offer donation to political parties to influence any decision or gain business advantage. Accordingly, Quadrafort does not make political contributions, donations and sponsorships of any kind to political parties and individual candidates.

### Third party management

Anti-Bribery and Corruption laws impose liability on companies that become involved in the direct or indirect acts of Bribery. The Company may therefore incur criminal and/or civil liability where Third Parties indulge in any act of Bribery in the course of their work on the Company's behalf, or otherwise for the Company's benefit. This exposure can arise even where the Company Employees



ensured to take preventive steps that improper payments or advantages are not offered or accepted on behalf of the Company by Third Party or their representatives.

To maintain the highest standards of integrity, with respect to any dealings with a Third Party, the Company will ensure that:

All the Third-Party contracts include Anti-Bribery and Anti-Corruption compliance clauses to ensure compliance with terms of this Policy.

Include appropriate wording/clauses in the Third-Party contracts to make it possible to withdraw from the relationship and take the appropriate disciplinary action, on the Third Parties who fail to abide by this Policy.

At the time of onboarding a Third Party and later on Annual basis, the Company must obtain an Anti-Bribery and Anti-Corruption undertaking or declaration from every Third Party to this effect. Every Third Party appointed for representing Quadrafort or carrying out any activity for Quadrafort must be hired/appointed in accordance with the guidelines, protocols and procedures around Third-Party identification, due diligence, on-boarding and approvals as set forth in Quadrafort's Third Party Management Policy.



### Anti-money laundering practices

Money laundering occurs when individuals or organizations try to conceal illicit funds or make those funds look legitimate. Money laundering is illegal and strictly prohibited by Quadrafort.

Quadrafort is strongly committed to prevent the use of its operations for money laundering, financing of terrorism, or any other criminal activities, and will take appropriate actions to comply with all the applicable anti-money laundering and anti-terrorism laws throughout the world.



Quadrafort conducts business only with reputable customers involved in legitimate business activities, with funds derived from legitimate sources. Jurisdictions in which Quadrafort and its Team operate may publish lists of individuals and organizations that any company is prohibited from accepting funds from or distributing funds to, under applicable Anti-Money Laundering laws. Employees are expected to use reasonable care to verify that counterparties are not owned or controlled by, or acting on behalf of, sanctioned governments, groups, individuals, organizations and other entities.

If an employee deal directly with customers or Third Parties, the following examples may signal potential money laundering:

- a. **Attempts to make large payments in cash.**
- b. **Payments by or to someone who is not a party to the contract.**
- c. **Requests to pay more than the amount as agreed in the contract.**
- d. **Payments made in currencies other than those specified in the contract.**
- e. **Payments from an unusual and/or non-business account.**
- f. **Transactions forming an unusual pattern such as bulk purchases of products or gift cards or repetitive cash payments.**



## Conflict of interest

This shall include, but will not be limited to, instances where an Quadrafort employee or director may have an interest of any kind in the Supplier's business, whether through personal relationships, investments, directorships or any kind of economic ties with the Supplier or any such relationship whereby the Supplier is in a position to directly/ indirectly influence the concerned employee.



Suppliers must disclose all actual or potential Conflicts of Interest with Quadrafort at the time of empanelment.

Supplier must immediately report if any of the Supplier's staff and/or officers had or have any relative employed with Quadrafort at the time of empanelment. Where such Supplier is already in service of Quadrafort at the time of the relative becoming an employee of Quadrafort, the Supplier must immediately notify Quadrafort of such employment once he/she is made aware about the same.

Failure to make such declaration shall be construed as a conflict of interest and might result in the exclusion of the Supplier from present and future procurement activities and/or other legal action as deemed fit by the Organization. For the purpose of this clause, the term "relative" shall include immediate family and shall include children, parents, spouse, partner and sibling.

## Political Contributions

The Company upholds its commitment to not support any specific political party or have any political affiliation. No

political contributions shall be made on behalf of the Company either directly or indirectly to any political party or for any political purpose without the prior approval of the Board Members. No employee shall use his job title or Company affiliation in connection with political activities.

## Charitable contributions and sponsorships

The Company shall ensure that charitable contributions and sponsorships are not used as a vehicle for bribery. We shall publicly disclose all our charitable contributions and sponsorships and ensure that all such transactions are legal and ethical under local laws and practices.

## Facilitation payments and Kickbacks

The Company prohibits facilitation or grease payments or kickbacks of any kind, regardless of whether such payments are permitted under applicable law. It is also our policy that we work to ensure that our employees, business associates and business partners do not make facilitation payments or kickbacks on our behalf. If you have doubts about a payment and suspect that it might be considered a facilitation payment, check with the Board Member for expertise and guidance. Any suspicions, concerns or queries regarding a payment should be raised with the HR Head.



## WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION?

It is important that you tell your Department Head or the HR as soon as possible if you are offered a bribe by a third party or are asked to give a bribe or suspect that this may happen in the future.

## WHISTLEBLOWING

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Company encourages openness and supports anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. If a violation of the relevant laws or policies is proven, appropriate action shall be taken. Company shall not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical or inappropriate behavior. All reports shall be treated confidentially. The Company is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or



potential bribery or other corruption offense has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, inform one of the Board Member immediately.

## ENFORCEMENT - DISCIPLINARY APPROACH

The Company's ABAC Policy shall be promoted and enforced consistently throughout the Company with clear and consistent disciplinary consequences to anyone who violates the Policy. All employees are expected to comply with the ABAC Policy.



## H: LABOR & WORKPLACE MANAGEMENT

- i) **Equal opportunity employer:** Provide a workplace free of direct or indirect discrimination, harassment or bullying on the grounds of gender, age, race, nationality or ethnic origin, disability, family responsibilities or parental status, marital status, the occupation of spouse or partner, medical or irrelevant criminal record, political convictions, pregnancy or potential pregnancy, religious beliefs or activities, sexual preference or sexuality, physical appearance, social origin etc.
- ii) **Dignity and respect:** Treat their workers equally regarding salaries, recruitment, professional training, promotion and working conditions, irrespective of criteria such as the ethnic origin, sexual orientation, gender, age, union membership or political and religious views of individuals. The Suppliers shall ensure compliance with minimum working hours and minimum wages prescribed by applicable local laws and regulations.
- iii) **Human rights:** Not use child, forced or involuntary labour in any form. Provide fair pay and working conditions, including maternity leave. Provide their employees a safe and healthy workplace, which complies with all applicable safety and health laws, regulations, and practices. Suppliers shall ensure that all legal requirements including but not limited to occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing are addressed.
- iv) **Freedom of association:** Recognize and respect the right to freedom of association and collective bargaining of its employees consistent with local/national laws and regulations.
- v) **Working outside employment with us:** Taking employment, accepting a position of responsibility or running a business outside employment with our company, in your own time, with or without remuneration, could interfere with your ability to work effectively at our company or create conflicts of interest. Any such activity must not be with any customer, supplier, distributor or competitor of our company. Our employees must notify and seek prior approval for any such activity as per the 'Conflicts of Interest' clause of this Code and in accordance with applicable company policies and law.
- vi) **Use of prohibited drugs and substances:** Use of prohibited drugs and substances creates genuine safety and other risks at our workplaces. We do not tolerate prohibited drugs and substances from being possessed, consumed or distributed at our workplaces, or in the course of company duties.
- vii) **Integrity of information and assets:** Our employees shall not make any wilful omissions or material misrepresentation that would compromise the integrity of our records, internal or external communications and reports, including the financial statements. Our employees and directors shall seek proper authorisation prior to disclosing company or business-related information, and such disclosures shall be made in accordance with our company's media and communication policy. This includes disclosures through any forum or media, including through social media. Our employees shall ensure the integrity of personal data or information provided by them to our company. We shall safeguard the privacy of all such data or information given to us in accordance with applicable company policies or law. Our employees shall respect and protect all confidential information and intellectual property of our company.



# I: DIVERSITY EQUITY INCLUSION POLICY (DEI)

## POLICY STATEMENTS

### Commitment to Diversity

- Strive for a diverse workforce at all levels, reflecting the communities and markets we serve.
- Proactively recruit from diverse talent pools.
- Ensure unbiased hiring, promotion, and compensation practices.



### Commitment to Equity

- Provide equal access to development opportunities, training, and promotions.
- Conduct regular pay equity analyses and rectify disparities.
- Ensure that policies and practices accommodate the needs of all employees, including those with disabilities.

### Commitment to Inclusion

- Foster a culture where all employees feel a sense of belonging.
- Regularly conduct inclusion surveys and act on feedback received.

## RESPONSIBILITIES

- **Board of Directors:** Oversee DEI initiatives and ensure alignment with corporate strategy.
- **Senior Management:** Lead by example, setting DEI goals within their departments.
- **Human Resources:** Develop and implement DEI programs and training.
- **Employees:** Participate in DEI initiatives and uphold inclusive behaviours

## IMPLEMENTATION

### Recruitment & Hiring:

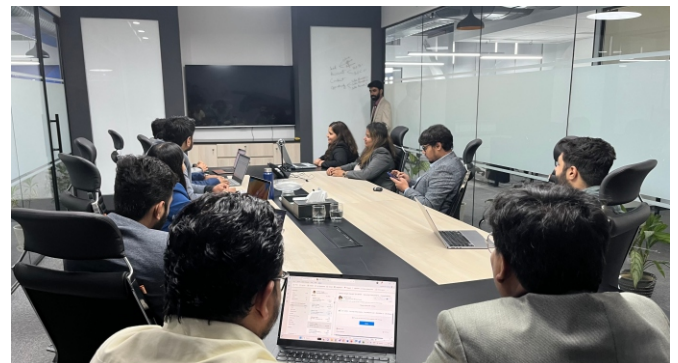
- Use structured interviews and diverse hiring panels.
- Engage with diverse recruitment agencies and educational institutions.

### Training & Development:

- Mandatory DEI training for all employees.
- Leadership programs focusing on inclusive management

### Communication:

- Regular DEI updates through internal communications.
- Celebrate cultural events and awareness days globally.





## J: ELIMINATION OF ALL FORMS OF CHILD LABOUR, FORCED AND COMPULSORY LABOUR

**Child Labour:** We do not employ any person under the age of 14 or the legal minimum age for employment, whichever is higher, in our organization. We also ensure that our suppliers and contractors do not engage in any form of child labour.

**Forced and Compulsory Labour:** We do not engage in any form of forced or compulsory labour, including bonded labour or any form of human trafficking. We also ensure that our suppliers and contractors do not engage in any form of forced or compulsory labour.

**Supply Chain:** We expect our suppliers and contractors to comply with this policy and will take appropriate action if any supplier or contractor is found to be engaging in any form of child labour, forced labour, or compulsory labour.

**Non-Retaliation:** We prohibit retaliation against any employee who reports or raises concerns about any form of child labour, forced labour, or compulsory labour. Employees who report or raise concerns will be protected and supported.

**Compliance Monitoring:** We will monitor our compliance with this policy and will conduct regular audits of our operations and supply chains to ensure that this policy is being implemented effectively.

**Training:** We will provide training to all employees, contractors, and suppliers associated with our organization on the prohibition of child labour, forced labour, and compulsory labour.

## K: ANTI HUMAN TRAFFICKING

### The Company strictly prohibits:

- Any form of human trafficking, forced labor, or child labor in its operations or supply chains.
- The use of deceptive recruitment practices or charging recruitment fees to job candidates.
- Employment discrimination and any violation of human rights.

### RESPONSIBILITIES

#### Management:

- Ensure compliance with this Policy across all branches and subsidiaries.
- Provide regular training and awareness programs.
- Conduct risk assessments and audits.

### Employees and Contractors:

- Report any suspected human trafficking or labor exploitation.
- Participate in training programs and understand the importance of compliance.
- Refrain from engaging in or supporting any form of trafficking or forced labor.

### Suppliers and Partners:

- Adhere to the standards set forth in this Policy.
- Implement measures to prevent human trafficking in their operations.
- Cooperate with audits and investigations initiated by the Company.

## L: CORPORATE SOCIAL RESPONSIBILITY POLICY

This Corporate Social Responsibility (hereinafter referred to as 'CSR') Policy is framed in terms of the Companies Act, 2013 (hereinafter referred to as 'the Act') read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as 'the CSR Rules'), as amended from time to time.

### PHILOSOPHY

Recognising that business enterprises are economic organs of society and draw on societal resources, it is Quadrafort's belief that a company's performance must be measured by its Triple Bottom Line contribution towards building economic, social and environmental capital. Quadrafort believes that in the strategic context of business, enterprises possess – beyond mere financial resources – the transformational capacity to create game-changing development models by unleashing their power of entrepreneurial vitality, innovation and creativity. In line with this belief, Quadrafort will continue crafting unique models which have a significant multiplier impact on sustainable livelihood creation and environmental replenishment.

Programmes, projects and activities (hereinafter collectively referred to as 'CSR Programmes') carried out in this regard are the subject matter of this Policy.

### CSR POLICY

It is Quadrafort's Policy to direct its CSR Programmes, inter alia, towards achieving one or more of the following - poverty alleviation; promoting education and skill development; ensuring environmental sustainability;

enabling climate resilience; and providing relief and assistance to victims of disasters and calamities.

In pursuit of the above, Quadrafort has identified the following focus areas for its CSR Programmes.

#### Early Childhood Care and Education



A happy, healthy and creative child whose rights are protected and honoured in a society that is built on respect for dignity, justice and equity for all. Malnutrition is the primary reason behind 69% of deaths of children below the age of five in India. Every second child in India, belonging to that age group is affected by some form of malnutrition. Recognising the importance of Early Childhood Education and Care, we are

associated with CRY (Child Rights and You)

#### Livelihood Enhancement through Technology Skilling

In today's world being educated by no means is about knowing only English, Hindi and Mathematics. One would not be able to survive in today's digital world, nor get benefit of Government services, if one did not know, how to use computers. In addition, there would be no job in future where some or other computer application would not be there, which will make a non-computer educated person a misfit for that job and consequently in our society. Hence knowing computers is no more a luxury but a basic necessity. To address these aspects, we got associated with Computer Shiksha which is run and managed by group of IT and management professionals who vowed to address the challenge of Digitals.





## Environmental Stewardship

Striving for sustainable eco-friendly growth  
**Our Environment programs will be delivered through:**

### Environmental NGOs

Recognized and Government Approved Incubators supporting social enterprises.

Eco engagement and volunteering initiatives along with our key stakeholders--employees, clients and suppliers and the communities we work and operate in

Extending support to any disaster relief efforts as required

### The Company aims:

To engage in affirmative action interventions thru 1% Pledge Program which we have committed to invest 1% of the company profit towards CSR activities.

To pursue CSR Programmes primarily in areas that fall within the economic vicinity of the Company's operations to enable close supervision and ensure maximum developmental impact.

## Governance

Every year, the CSR and Sustainability Committee will place for the approval of the Board of Directors of the Company (hereinafter referred to as 'the Board'), an

annual CSR Action Plan (hereinafter referred to as 'CSR Plan') delineating the CSR Programmes to be carried out during the financial year, including the budgets thereof, their manner of execution, implementation schedules, modalities of utilisation of funds, and monitoring & reporting mechanism for the CSR Programmes. The Board will consider and approve the CSR Plan with such modification that may be deemed necessary; the CSR Plan may also be modified by the Board during the financial year, on the recommendation of the CSR and Sustainability Committee.

## CSR Expenditure

It will be the Company's endeavour to spend in every financial year, one percent of its net profits on CSR Programmes in pursuance of this Policy.

The CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Programmes undertaken in accordance with the CSR Plan.

## CSR Committee

As per the provisions of the companies Act, 2013, following is the composition of CSR Committee:

- 1 **Surinder Kumar**
- 2 **Alkesh Kumar Mishra**
- 3 **Manish Bharvesh**

This Policy will be posted on the Company's corporate website [www.quadrafort.com](http://www.quadrafort.com) and web link thereto will be disclosed in the Board's Report of the Company.

In the event of any inconsistency between this Policy and the applicable laws, the applicable laws will prevail. This Policy will be reviewed by the Board, on the recommendation of the CSR and Sustainability Committee, as and when deemed necessary.

## M: RELATED PARTY TRANSACTION POLICY

QUADRAFORT TECHNOLOGIES LIMITED ("Quadrafort" or "Company") is governed, amongst others, by the rules and regulations framed by Companies Act, 2013. Company is to formulate a policy on materiality of Related Party Transactions ("RPT") and also on dealing with Related Party Transactions.

Accordingly, the Company has formulated this policy (Policy) on materiality of Related Party Transactions and on dealing with Related Party Transactions. This Policy regulates all transactions between the Company and its Related Parties.

### REVIEW AND APPROVAL OF RELATED PARTY TRANSACTION

All the transactions which are identified as Related Party Transactions and subsequent modifications thereof, shall be approved by the Board in the manner specified under the Act. The Board shall consider all relevant factors while deliberating the Related Party Transactions for its approval

Any member of the Board who has a potential interest in any Related Party Transaction shall recuse himself and abstain from discussion and voting on the approval of the Related Party transaction.

A Related Party Transaction which is not in the ordinary course of business, or not at arm's length price, would require approval of the Board or of shareholders, as detailed in subsequent paragraphs.

The Board may grant omnibus approval for Related Party Transactions which are repetitive in nature and subject to such criteria/conditions as it may consider necessary in line with this Policy and in the interest of the Company.

Such omnibus approval shall be valid for a period not exceeding one year and shall require fresh approval after the expiry of one year.

The Board shall review, on a quarterly basis, the details of Related Party Transactions and material modifications thereof, entered into by the Company pursuant to the omnibus approval. In connection with any review of a Related Party Transaction, the Board has authority to modify or waive any procedural requirements of this Policy.

A Related Party Transaction entered into by the Company, which is not under the omnibus approval or otherwise pre-approved by the Board, will be placed before the Board for ratification.

The Board shall also pre-approve related party transactions, where the Company is not a party, but the Company's subsidiary is a party.

### BOARD OF DIRECTORS

In case any Related Party Transactions are referred by the Company to the Board for its approval due to the transaction being (i) not in the ordinary course of business, or (ii) not at an arm's length price, the Board will consider such factors as, nature of the transaction, material terms, the manner of determining the pricing and the business rationale for entering into such transaction. On such consideration, the Board may approve the transaction or may require such modifications to transaction. Any member of the Board who has any interest in any Related Party Transaction will recuse himself and abstain from discussion and voting on the approval of the Related Party Transaction.



## SHAREHOLDERS

If a Related Party Transaction is (i) a material transaction as per Companies Act, 2013 or (ii) not in the ordinary course of business, or not at arm's length price and exceeds certain thresholds prescribed under the Companies Act, 2013, then such RPT and any subsequent material modification thereto, shall require shareholders' approval by a resolution. In such a case, any member of the Company who is a Related Party, irrespective of being related to the said transaction or not, shall not vote on resolution passed for approving such Related Party Transaction.

The provisions of Section 188 of Companies Act, 2013 read with relevant rules thereof shall not be applicable in case of transactions entered into between a holding company and its wholly owned subsidiary and between two wholly-owned subsidiaries, whose accounts are consolidated with such holding company and placed before the shareholders at the general meeting for approval.

In the event the Company becomes aware of a Related Party Transaction with a Related Party that has not been approved under this Policy prior to its consummation, the

Company would obtain post facto approval from the Board, the Board and/or shareholders as required under applicable laws/ regulations and such a transaction shall not be deemed to violate this Policy, or be invalid or unenforceable, so long as post facto approval is obtained as promptly as reasonably practical after it is entered into or after it becomes reasonably apparent that the transaction is covered by this policy.

## REPORTING

Every contract or arrangement, which is required to be approved by the Board or the shareholders under this Policy, shall be referred to in the Board's report to the shareholders along with the justification for entering into such contract or arrangement

## LIMITATION AND AMENDMENT

In the event of any conflict between the provisions of this Policy and of the Act or any other statutory enactments, rules, the provisions of such Act or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the Act and/or applicable laws in this regard shall automatically apply to this Policy.

## N: POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORK PLACE

**Sexual harassment at the workplace results in violation of the fundamental rights;**

- to equality under Articles 14 and 15 of the Constitution of India
- to life and to live with dignity under article 21 of the Constitution
- to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.
- Protection against sexual harassment and the right to work with dignity are universally recognised human rights by international conventions

The **QUADRAFORT TECHNOLOGIES LIMITED**, hereinafter referred to as “Quadrafort” is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and in a harassment free workplace to all employees without regard to race, caste, religion, colour, ancestry, marital status, gender, age, nationality, ethnic origin or disability.

The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving an employee or employees is a grave offence and is therefore, punishable

This Policy extends to all employees of Quadrafort and any other company which may be incorporated in future with applicability of Quadrafort HR policies - hereinafter referred to as 'Company' / 'Organization' in this policy. It is deemed to be incorporated in the service conditions of all employees of the Company in India. Local country laws

will take precedence over this policy, in other geographies, if applicable.

This Policy applies to all Company stakeholders at all locations, including offices, remote working environments, client sites, and during work-related travel or events.

### INTRODUCTION:

At Quadrafort, all employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders. This means that employees have a responsibility to

- Treat each other with dignity and respect
- Follow the letter and spirit of law
- Refrain from any unwelcome behaviour that has sexual connotation (of sexual nature)
- Refrain from creating hostile atmosphere at workplace via sexual harassment
- Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the company.

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail. If any aspect relating to sexual harassment not explicitly covered in this policy is provided for by the law, then the law will be applicable.



In case of any conflict between the policy and the law, the law will prevail. This policy provides protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

### SCOPE

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees of the Company in India. Local country laws will take precedence over this policy, in other geographies, if applicable.

### ROLES AND RESPONSIBILITIES

It is the responsibility of all to respect the rights of others and to never encourage harassment.

It can be done by:

- Refusing to participate in any activity which constitutes harassment
- Supporting the person to reject unwelcome behavior
- Acting as a witness if the person being harassed decides to lodge a complaint

### REDRESSAL MECHANISM

Formal Intervention In compliance with the Act, any complaint under this policy shall be followed by a formal redressal mechanism as described in this Policy.

- Internal Complaints Committee** (Henceforth known as 'committee') To prevent instances of sexual harassment

and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (IC) have been appointed for all administrative units / offices of the company. The detail of the committee is notified to all covered persons at the location (workplace).

The committee at each location comprises of:

- Presiding Officer:** A woman employed at a senior level in the organization or workplace
- At least 2 members from amongst employees, committed to the cause of women or who have had experience of social work or have legal knowledge
- One external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment
- At least one half of the total members nominated being women

The committee will be responsible for:

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in the prescribed format

b. **Committee Members** Internal Complaint Committees have been formulated comprise of the following:

S. No	Details of IC	Name	Official Designation	Contact detail & email-id
1	Chairperson	Ms. Barkha Dwivedi	Sr. Manager - Solution Sales	+91 8860977441 <a href="mailto:barkha@quadrafort.com">barkha@quadrafort.com</a>
2	Member	Ms. Neha Sarpal	Director Compliance & Governance	+91 70537 15771 <a href="mailto:Neha@Quadrafort.com">Neha@Quadrafort.com</a>
3	Member	Ms. Anjali Kachhap	Associate Manager - Talent Acquisition and Human Resource	+ 918789104998 <a href="mailto:Anjali@Quadrafort.com">Anjali@Quadrafort.com</a>
4	Member	Mr. Jitendra Kumar Tiwari	Head HR	+91 8317096237 <a href="mailto:Jitendra@Quadrafort.com">Jitendra@Quadrafort.com</a>
5	Member	Mr. Ayush Tripathi	AVP- Solution Engineering	+919479499792 <a href="mailto:Ayush@Quadrafort.com">Ayush@Quadrafort.com</a>
6	External Member (NGO)	Mr. Bharat Bhushan	External member from Arya Veer Netra Chikatsalya	+91 9810168944 <a href="mailto:bhushan@aryantechonline.com">bhushan@aryantechonline.com</a>

### c. Lodging a Complaint

An aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Committee at [posh@quadrafort.com](mailto:posh@quadrafort.com) within a period of 3 months from the date of incident/ last incident. The Internal Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint within the period.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaint Committee shall render all reasonable assistance to the women for making the complaint in writing.

1. If the Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by: a. her relative or friend; or b. her co-worker; or c. an officer of the National Commission for Women or State Women's Commission; or d. any person who has knowledge of the incident, with the written consent of the Aggrieved Woman
2. If the Aggrieved Woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by: a. her relative or friend; or b. a special educator; or c. a qualified psychiatrist or psychologist; or d. the guardian or authority under whose care she is receiving treatment or care; or e. any person who has knowledge of the incident jointly with the Aggrieved Woman's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care
3. If the Aggrieved Woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent.
4. If the Aggrieved Woman is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir. The complaint shall be submitted by the complainant to the IC in writing or shall be submitted to the IC electronically at [posh@quadrafort.com](mailto:posh@quadrafort.com) The complaint can also be physically submitted to any IC member.



d. **Receiving a Complaint (guidelines)** Dealing with incidents of harassment is not like any other type of dispute. Complainants may be embarrassed and distressed and it requires tact and discretion while receiving the complaint.

**The following points are to be kept in mind by the receiver of the complaint: -**

Complaints are listened to and the complainant informed that the Company takes the concerns seriously. Complainant is informed that these concerns will be reported to the appropriate committee and follow up will be done speedily. - Situations are not be pre-judged. Written notes are to be taken while listening to the person. When taking notes, complainants own words, where possible, are to be used accurately. Clear description of the incident in simple and direct terms is prepared and details are confirmed with the complainant. - All notes are kept strictly confidential. Complainant's agreement is taken to allow proceeding with the matter, which involves a formal investigation. - The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity Care is taken to prevent any disadvantage to or victimization of either the complainant or the respondent.

e. **Resolution procedure** through conciliation Once the complaint is received, before initiating the inquiry, the committee may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved woman. No monetary settlement can be made as a basis of conciliation. In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action. Resolution through conciliation is to happen within 2 weeks of receipt of complaint. The committee shall provide copies of the settlement to complainant & respondent. Where a settlement is arrived at, no further inquiry is to be conducted by the committee.

f. **Resolution procedure through formal inquiry**

The committee will initiate inquiry in the following cases:

- No conciliation is requested by aggrieved woman
- Conciliation has not resulted in any settlement
- Complainant informs the committee that any term or condition of the settlement arrived through

conciliation, has not been complied with by respondent

#### 1. **Manner and Procedure of inquiry into complaint:**

- Complainant should submit the complaint along with supporting documents and the names of the witnesses, if any.
- The Committee will hold a meeting with the Complainant within seven days of receipt of the complaint, but no later than a week in any case.
- At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint.
- The Committee shall proceed with the enquiry and communicate the same to the Complainant and Respondent.
- Upon receipt of the complaint, the committee will send 1 copy of the complaint to Respondent within 7 working days of receiving the complaint.
- Respondent shall reply with all supporting documents within 10 working days of receiving the copy of the complaint.
- Thereafter, the Respondent may be called for a deposition before the Committee and an opportunity will be given to him to give an explanation, where after, an inquiry shall be conducted and concluded.
- The Complainant shall be provided with a copy of the written explanation submitted by the Respondent.
- If the Complainant or the respondent desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es that they propose to call.
- The Committee shall call upon all witnesses mentioned by both the parties.
- The Committee shall provide every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective case.
- If either party desires to tender any documents by way of evidence before the Committee, the

same is to be supplied as original copies of such documents. Signatures should be affixed on the respective documents to certify these to be original copies.

- No legal practitioner can represent any party at any stage of the inquiry procedure. The Complaints Committee is to make inquiry into the complaint in accordance with the principles of natural justice.
- In conducting the inquiry, a minimum of three committee members including the Presiding Officer are to be present.
- The employer shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

If the complainant or respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements. In case complainant or respondent seeks to ask questions to the other party, they may give them to the Committee which asks them and records the statement of the other party. Any such inquiry is completed, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry is commenced. The inquiry procedure should ensure absolute fairness to all parties.

**2. Interim relief During pendency of the inquiry**, on a written request made by the complainant, the committee may recommend to the employer to:

- Transfer the complainant or the respondent to any other workplace
- Grant leave to the aggrieved woman of maximum 3 months, in addition to the leave she would be otherwise entitled

- Prevent the respondent from assessing complainant's work performance
- Grant such other relief as may be appropriate. Once the recommendations of interim relief are implemented, the same is informed to the committee.

**3. Termination of Inquiry** Committee may terminate the inquiry or give ex-parte decision, if complainant or respondent respectively is absent for 3 consecutive hearings, without sufficient reason. 15 day written notice is to be given to the party, before termination of enquiry or ex-parte order.

**4. Action to be taken after inquiry** Post the inquiry, the committee submits its report containing the findings and recommendations to the employer, within 10 days of completion of the inquiry.

**5. Complaint unsubstantiated** Where the committee arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter. Further, the committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded, and neither will be disadvantaged within the Company.

**6. Complaint substantiated** Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- Counseling
- Censure or reprimand
- Apology to be tendered by respondent
- Written warning
- Withholding promotion and/or increments
- Suspension
- Termination
- Or any other action that the employer may deem fit.



The Company is required to act upon the recommendations within 60 days and confirm to the committee. Post implementation of the actions, follow up with the complainant should also occur to ascertain whether the behavior has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring.

**7. Penal Consequences** of Sexual Harassment In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the employer, for making a Police Complaint. Under the Indian Penal Code, (IPC), the newly introduced Section (S. 354A) which deals with Sexual Harassment has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested without a warrant.

**8. Malicious Allegations** Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the woman or the person making the complaint. While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

**9. Confidentiality** The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

**10. Appeal** Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act, within 90 days of the recommendations being communicated.

**11. Awareness** Awareness sessions are to be organized to:

- Formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women.
- Carry out orientation programs and seminars for the Members of the IC.
- Conduct capacity building and skill building programs for the Members of the IC. Declare the names and contact details of all the Members of the IC.
- Use modules developed by the State Governments to conduct workshops and awareness programs for sensitizing the employees with the provisions of the Act.

**12. Legal Compliance** The IC shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the employer and the District Officer (as defined in the Act). The report shall have the following details:

- number of complaints of Sexual harassment received in the year
- number of complaints disposed of during the year
- number of cases pending for more than 90 days
- number of workshops or awareness program against Sexual Harassment carried out
- nature of action taken by the employer or District Officer



## O: PROTECTING QUADRAFORT 'S ASSETS

The assets of Quadrafort shall not be misused but shall be employed for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials and resources as well as intangible assets such as Intellectual Property Rights, Knowhow & Technology, proprietary information, relationships with customers and suppliers, etc. The Stakeholders must maintain physical and electronic security for all confidential information. Stakeholders should use extreme care in protecting confidential or proprietary information of any kind. Face-face discussions should be conducted in a secure location. If confidential information to be discussed or exchanged between Quadrafort and the supplier or any of the stakeholders, or the supplier and a Third Party, the parties must first ensure that a confidentiality or Non-Disclosure Agreement has been signed and is being complied with.

The Stakeholders shall take appropriate steps to safeguard and not infringe any Quadrafort's confidential



and proprietary information/intellectual property/ technology which come to its knowledge during the course of its business relationship/ dealings with Quadrafort. In case of sub-contracting, sharing of confidential information should be made with the consent of Quadrafort.





## P: DATA PROTECTION & DATA PRIVACY

Stakeholders are required to protect Quadrafort and its customers' proprietary information, protect its confidentiality and shall not, without the prior written consent of Quadrafort, disclose such information to any other person or use such information in any manner.

Stakeholders are expected to comply with all applicable laws and regulations governing the protection, use, and disclosure of firm proprietary, confidential and personal information. Suppliers may only use confidential firm information to perform work on behalf of Quadrafort and may not disclose such information unless such disclosure is required by law; provided that Quadrafort has been given reasonable advance notice of any such requirement to disclose the information to enable Quadrafort to take necessary action on such disclosure.

Upon expiration or termination of business relationship

with Quadrafort , the Suppliers will promptly return to Quadrafort or destroy, all confidential Information of Quadrafort and certify such return and/or destruction to Quadrafort.

Stakeholders including suppliers/clients must be aware of and follow the applicable local laws and regulations regarding the protection of an individual's personal information, including Quadrafort 's customers and employees. Where a privacy incident occurs or is suspected i.e., the unauthorized access to or misuse of any personal information of Quadrafort customer/ contractor's/ employee, suppliers must immediately report such incident to [privacy@Quadrafort.com](mailto:privacy@Quadrafort.com)

For more details, please refer data privacy policy available on Quadrafort website  
<https://quadrafort.com/pages/privacy-notice>

## Q: USE OF SOCIAL MEDIA POLICY

### 1. PURPOSE AND SCOPE

This Use of Social Media Policy ("Policy") outlines the standards and guidelines for the responsible use of social media by all stakeholders of Quadrafort Technologies Limited ("Company"), including but not limited to employees, contractors, directors, consultants, clients, suppliers, and third-party affiliates.

#### This Policy applies to:

- All forms of social media platforms (e.g., Facebook, LinkedIn, Twitter, Instagram, YouTube, blogs, forums, etc.)
- Personal and professional accounts where content could reference or impact the Company.
- Use of social media during and outside working hours.

Compliance with this Policy is mandatory under applicable laws including the Information Technology Act, 2000 (India), the General Data Protection Regulation (GDPR) (EU), Digital Services Act (EU), Communications Decency Act (USA), and any other jurisdiction-specific regulations applicable to the Company's operations.

### 2. LEGAL AND REGULATORY FRAMEWORK

**Information Technology Act, 2000 (India):** Under Section 66A and Section 69A, any offensive, defamatory, or unauthorized content dissemination is prohibited. Stakeholders are responsible for ensuring their online activities comply with these provisions.

**Data Protection Laws:** Employees and stakeholders must adhere to data privacy regulations such as the GDPR, Personal Data Protection Bill (India), and any local privacy laws while handling personal and sensitive data.

**Intellectual Property Rights:** In compliance with the Copyright Act, 1957 (India) and international treaties, unauthorized use or sharing of copyrighted material, trademarks, or trade secrets is strictly prohibited.

**Securities Laws:** Any communication on social media that could potentially affect the market perception or stock price of the Company must comply with SEBI (Prohibition of Insider Trading) Regulations, 2015.

**Anti-Defamation and Anti-Harassment:** Users must refrain from any defamatory, offensive, or harassing content, adhering to provisions under the Indian Penal Code, 1860, and international harassment prevention laws.





### 3. POLICY GUIDELINES

#### 3.1 Professional Conduct:

- Maintain professionalism in all online interactions that could be linked to the Company.
- Refrain from posting offensive, discriminatory, or derogatory comments related to the Company, clients, or competitors.

#### 3.2 Confidentiality and Data Protection:

- Do not disclose confidential information, trade secrets, client data, or internal communications.
- Obtain necessary permissions before sharing any content related to Company projects or clients.

#### 3.3 Representation:

- Only authorized personnel may post on behalf of the Company.
- Personal opinions must include disclaimers such as, "Views expressed are personal and do not represent the Company."

#### 3.4 Intellectual Property Usage:

- Do not use Company logos, trademarks, or proprietary images without prior written approval.
- Ensure third-party content shared is free from copyright infringement.



#### 3.5 Use During Working Hours:

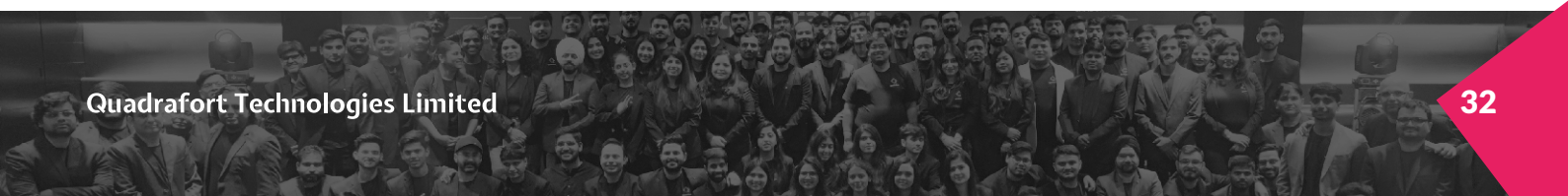
- Personal use of social media during work hours should not interfere with job responsibilities.
- Access to certain platforms may be restricted on Company devices and networks.

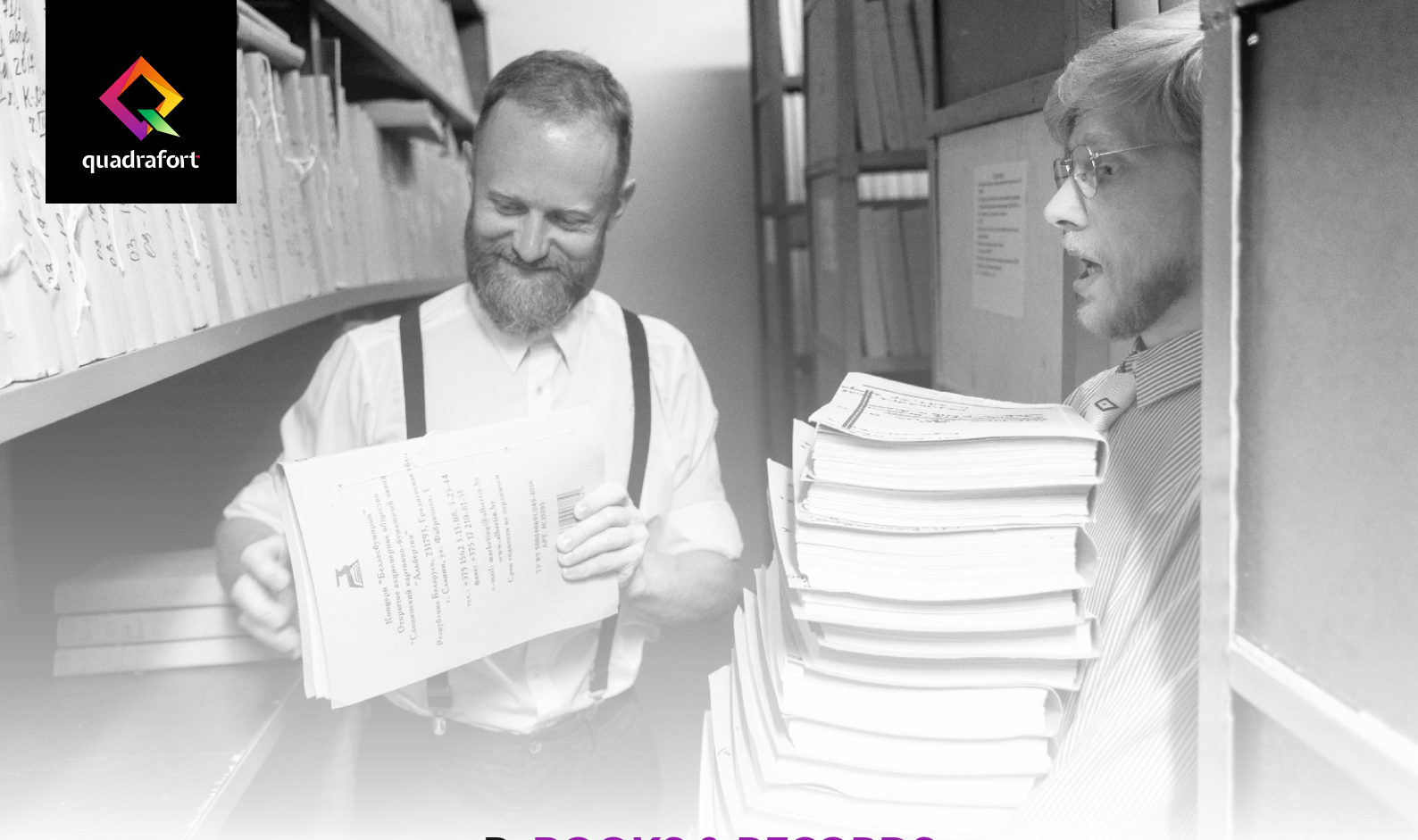
#### 3.6 Crisis Management:

- In the event of negative publicity or crisis, refrain from posting any information. All communications must be handled by the designated spokesperson.

### 4. VIOLATIONS AND CONSEQUENCES

- 4.1 Breaches of this Policy may result in disciplinary actions including termination, legal action, and/or criminal prosecution under applicable laws.
- 4.2 The Company reserves the right to monitor public social media for potential violations.





## R: BOOKS & RECORDS

There are certain types of records that need to be retained for a specified period of time, as identified below.

- Documents to be preserved permanently: The documents listed in Schedule I along with any other documents required legally shall be maintained and preserved permanently by the Company.
- Documents to be preserved for no less than eight (8) years: The documents listed in Schedule II along with any other documents required legally shall be maintained and preserved for no less than eight (8) years by the Company.
- Documents to be preserved for no less than three (3) years: All communications to the Board and committees of the Board with regard to calling of meetings.

**Records may be preserved for longer periods of time where required under any other Applicable Laws.**

Similarly, if an employee believes, or the Company requires that, Company records are relevant to litigation or potential litigation, then these records need to be preserved until the Legal Department advises otherwise. This Policy will be reviewed periodically by the senior management and amendments may be made, subject to approval of the Board, if and when required. The senior

management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time.

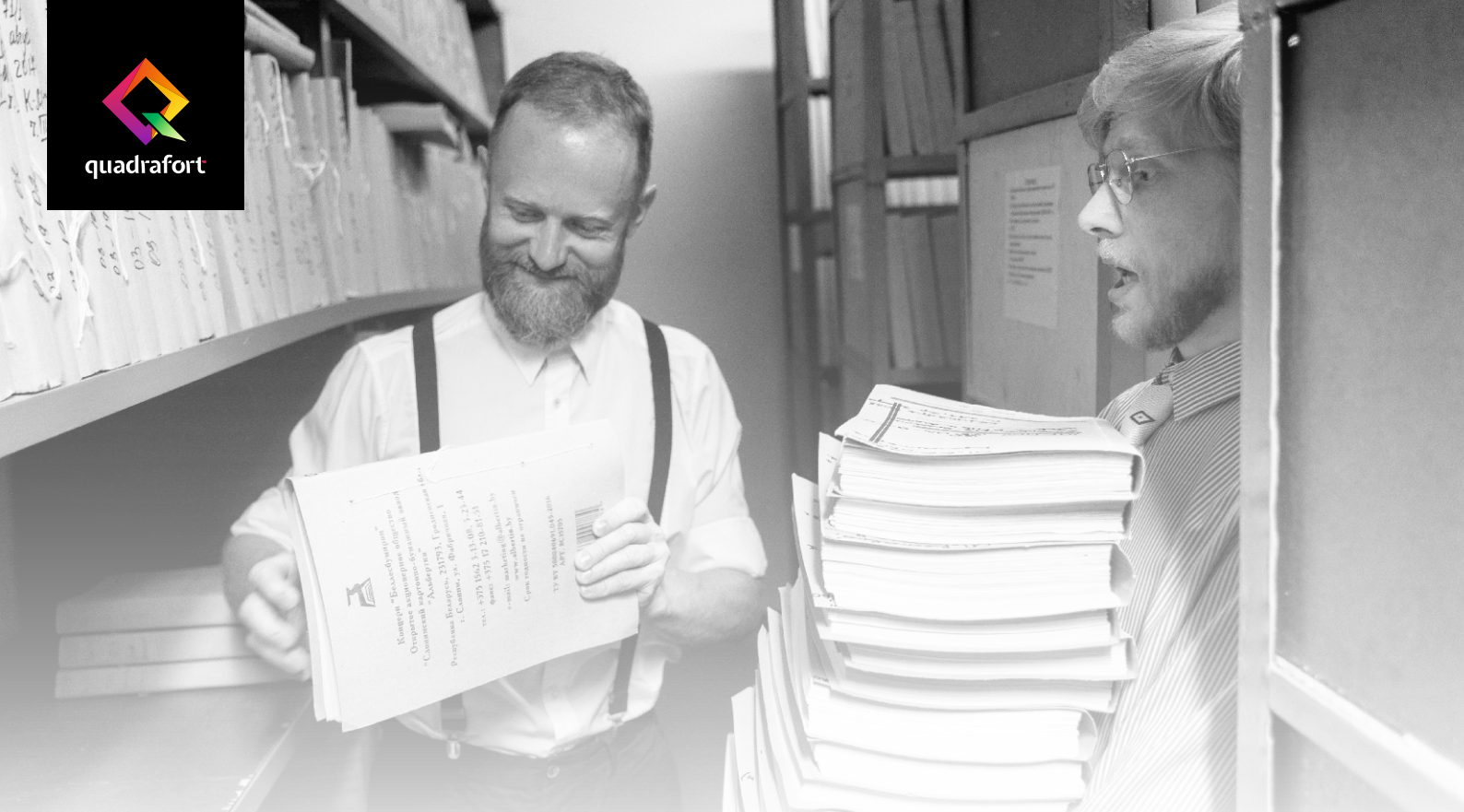
### Limitation, Review and Amendment

In the event of any conflict between the provisions of this Policy and of the Applicable Laws, the provisions of Applicable Laws shall prevail over this Policy. Any subsequent amendment / modification to the Applicable Laws shall automatically apply to this Policy

Quadrafort's stakeholders must not engage in any actions or transactions which lead to financial or reputational loss to the Company or are blatant acts of fraud. All corporate records of Quadrafort must be true, accurate and complete, and the Company data must be promptly and accurately entered in our books in accordance with Quadrafort's and accounting principles, applicable laws and regulations.

Suppliers must not improperly influence, manipulate or mislead any audit, nor interfere with any auditor engaged to perform an independent audit of their books, records, processes or internal controls. No supplier in any way will cause the Company's accounts or other records to not clearly describe and properly state the true nature and timing of a business activity or transaction.





Suppliers are responsible for maintaining accurate and complete books and records and complying with all required controls and procedures for records created because of business activities conducted on behalf of Quadrafort including retention requirements.

Quadrafort will make certain that all disclosures made in financial reports, public documents or any regulatory filings are full, fair, accurate, timely and understandable. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records. Suppliers must inform the Compliance Officer if they learn that information in any filing or public communication was untrue about them or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

## RECORD-KEEPING

Company's books and records shall be fair and accurate and reasonably detailed. The Company shall keep financial records and have appropriate internal controls in place, which shall evidence the business reason for making payments to third parties. The Company shall declare and keep a written record of all gifts and hospitality accepted or offered, which shall be subject to HR review. The Company shall ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our Policy and specifically record the identity of any third parties and the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with



third parties, such as clients, suppliers and business contacts, shall be prepared and maintained with strict accuracy and completeness. No accounts shall be kept off-book to facilitate or conceal improper payments.





## S: ENVIRONMENTAL, SOCIAL AND GOVERNANCE MANAGEMENT

**"We believe that the community and the environment are not just stakeholders, but shareholders in our success, deserving the same commitment and responsibility as any investor."**

We at Quadrafort, are committed to imbibe the philosophy of sustainability as an integral part of our business and earnestly commit ourselves to uphold this as governing framework for all our business endeavors. We work to create long lasting value for the environment, society, and business. This facilitate us to promote diversity, ensure social equality, enhance environmental performance, mitigate future risks, and improve economic prosperity.

- We are committed to good corporate citizenship, and shall actively assist in the improvement of the

quality of life of the people in the communities in which we operate.

- We engage with the community and other stakeholders to minimise any adverse impact that our business operations may have on the local community and the environment.
- We encourage our workforce to volunteer on projects that benefit the communities in which we operate, provided the principles of this Code, where applicable, and in particular the 'Conflicts of Interest' clause are followed.





## T: SECURE COMMUNICATION CHANNELS

Quadrafort has established a secure communication channel to enable the concerned to raise their concerns confidentially and responsibly.

All such reports may be made without fear of reprisal and with the assurance that the Company is behind you. Threats, retribution or retaliation against any person who has in good faith reported a violation or a suspected violation of law, this Code or other Company policies, or against any person who is assisting in any investigation or process with respect to such a violation, is prohibited.

If the questions are about the Code of Conduct or wishes to report a questionable behavior or possible violation of

the Code of Conduct, the person is encouraged and should contact Quadrafort's Legal and HR at email address [whistleblower@Quadrafort.com](mailto:whistleblower@Quadrafort.com)

If the question is about sexual harassment, the person is encouraged and should contact Quadrafort's ICC Committee Chairperson at email address – [posh@quadrafort.com](mailto:posh@quadrafort.com)

If question is relevant to privacy breach, the person is encouraged and should contact Quadrafort's privacy officer at e mail address- [privacy@Quadrafort.com](mailto:privacy@Quadrafort.com)

### Urge is one has to follow appropriate channel to communicate without disrupting operations.

Quadrafort will not tolerate any retribution or retaliation by anyone against a concerned Supplier who has, in good faith, sought out advice or has reported questionable behavior and/or a possible violation.

Quadrafort will take disciplinary action up to and including termination of contract for anyone who threatens or engages in retaliation, retribution or harassment of the concerned individual. Identities and contents of all information or complaints will be treated strictly confidential.

#### Corrective action may be taken if you:

- Violate the Code, Company policies and procedures, or applicable laws.

- Direct others to violate the Code, Company policies and procedures, or applicable laws.
- Are aware of a violation or potential violation, and fail to report it.
- Fail to effectively monitor the actions of people you manage.
- Do not cooperate in a Company audit or investigation.
- Fail to participate in required training.
- Retaliate against someone for reporting a concern in good faith or for participating in an investigation of such a report.
- Disclose information learned during an internal investigation.



## U: TRAINING & AWARENESS

The Company must ensure to inculcate all the principles as laid down in the Code and other ethics and compliance policies of the Company by imparting trainings as follows:

- i. To all new suppliers, Clients, Employees, Partners and affiliates covering Quadrafort's Code of Conduct, Anti- Bribery and Anti-corruption Policies,

Anti Money Laundering Policy and other related policies, within 30 days of onboarding.

- ii. Annual refresher training to all the suppliers to educate them on the requirements and obligations as laid down by the Company' Code and all the other ethics and compliance policies and procedures as well as rules and requirements of all applicable laws and regulations.

## V: REVIEW OF THE CODE

Quadrafort will in general annually and if required periodically review this Code and make amendments as

considered necessary in the interest of governance and in accordance with the relevant laws and regulations.

## W: ADMINISTRATION OF THE POLICY

The Code is accessible to all the concerned parties on the Company's intranet or internet. The Company must also inform all the Third Parties about this Policy or any amendments thereof, through online upload of the Code on the Company's website or any other mode as may be deemed to be necessary in this regard.

Any questions, exceptions or evaluations related to this Code must be forwarded to Compliance Officer, by means, such as email, by phone or in person.





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## X: RAISING CONCERNS

We encourage our employees, customers, suppliers and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of our Code, policies or law.

We also encourage reporting of any event (actual or potential) of misconduct that is not reflective of our values and principles. Avenues available for raising concerns or queries or reporting cases could include:

- immediate line manager or the Human Resources department of our company
- designated ethics officials of our company

- any other reporting channel set out in our company's 'Whistleblower' policy.

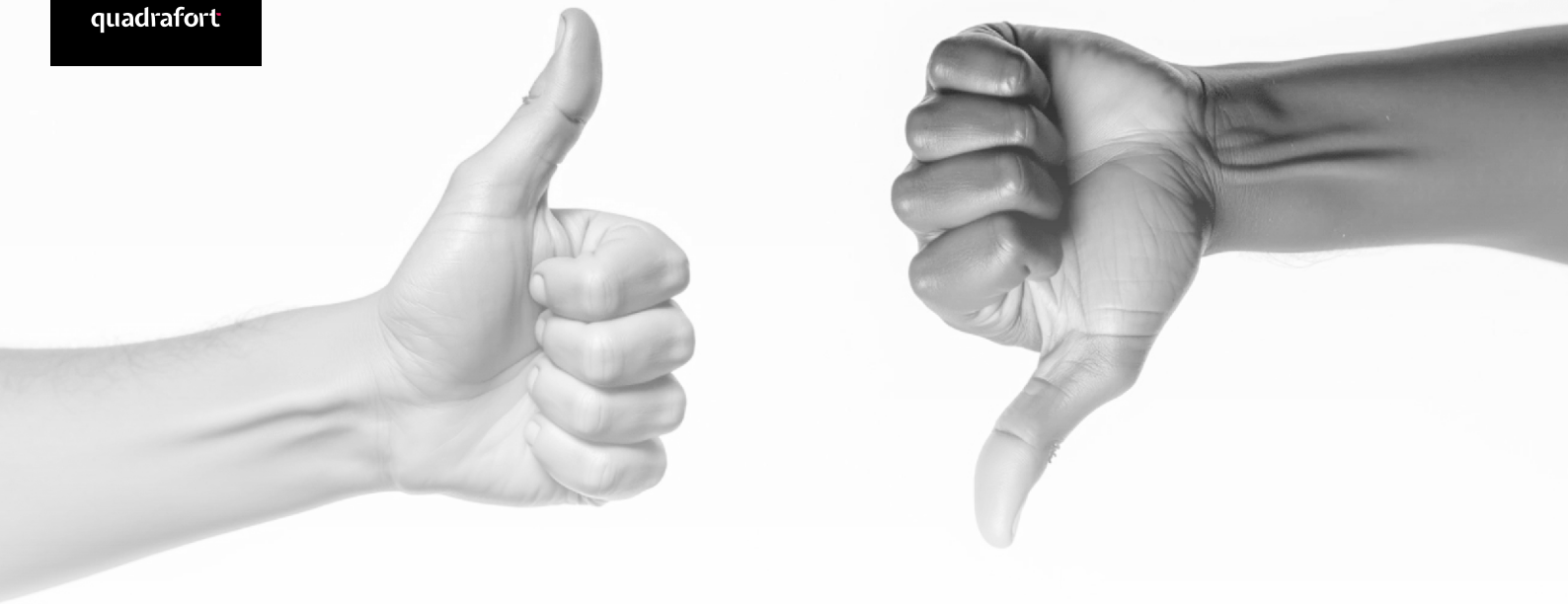
We do not tolerate any form of retaliation against anyone reporting legitimate concerns. Anyone involved in targeting such a person will be subject to disciplinary action. If you suspect that you or someone you know has been subjected to retaliation for raising a concern or for reporting a case, we encourage you to promptly contact your line manager OR the Human Resources department.

## Y: ACKNOWLEDGEMENT AND ACCEPTANCE

At the time of empanelment/employment, the concerned person is expected to fill the questionnaire provided by Quadrafort. The undersigned hereby acknowledges that it has received Quadrafort Code of Conduct (the "Code") and agrees that all its authorized agents, subcontractors, affiliates, suppliers, doing business with Quadrafort will receive the Code and certify that having fully read and understood the completed requirement of this Code of Conduct, do hereby commit ourselves to serve this Code of Conduct and to fully comply with all of its principles and

also acknowledges that its failure to comply with the Code may result in terminating the business/otherwise relationship with and allows Quadrafort to take legal action as it deems necessary.

Signature: \_\_\_\_\_



## Z: LIST OF DO'S & DON'TS

The below list of Dos and Don'ts is a guideline and does not substitute the contents of the policy, which must be complied with in entirety.

### Do's

- Read the contents of the Code of conduct and ensure that you are not in violation of any of the clauses.
- Accept the Code of conduct in a timely manner.
- Actively monitor and ensure compliance with all applicable laws and Quadrafort policies as amended from time to time.
- Ensure that Code of conduct is explained to employees, subsidiaries, business partners and subcontractors.
- Conduct business with integrity and exhibit responsible ethical behavior in all interactions with Quadrafort and/or its customers.
- Maintain documentation necessary to demonstrate compliance with Code of conduct.
- Report any breach/violation of Supplier Code of conduct by employees, subsidiaries, business partners and/or sub-contractors in a timely manner.

### Don'ts

- Indulge in any practice or means that violates the applicable laws
- Hide or delay reporting an identified breach/violation of the Code of conduct to Quadrafort.
- Obstruct any investigation undertaken for breach/violation of the Code of conduct.
- Share confidential information or data of Quadrafort with any third party.
- Engage in any unfair practice or exert undue influence over Quadrafort and/or its clients.





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**ABU DHABI:** Building 1, Musaffah - M39 - 12, Sector M39, Abu Dhabi

**SAUDI ARABIA:** Amaz Tower, King Fahd Rd., An Namudhajiyyah, Riyadh 12731

**USA:** 215 Ann Arbor Road, Suite 304 Plymouth, MI 48170

**SOUTH AFRICA:** 210 Barry Hertzog, Greenside, Johannesburg, Gauteng 2193