



# EMPLOYEE CODE OF CONDUCT



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# 1. Introduction

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Photon is committed to achieving best-in-class ethical workplace practices in all our business dealings and interactions within and outside the organization.

We display an unwavering commitment to our responsibilities as a vendor and business partner to demonstrate the highest standards of business conduct, integrity, and adherence to the law.

We encourage our employees to speak up and report any actions they are aware of or involved in that could potentially malign the company's brand image, interests, and operations. Under no circumstances shall any nonadherence to this policy be condoned or tolerated. This is in keeping with Photon's constant pursuit of excellence in everything we do.

An employee with supervisory responsibilities is additionally expected to educate, imbibe, practice, and inform team members of the contents of this Code of Conduct.

Any non-compliance with the provisions enlisted in this Code will warrant disciplinary action up to and including summary dismissal of services. Please read our separation policy for further information in this regard.



## 2. Scope

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This policy applies to all employees, on the roll or otherwise, vendor-deployed third-party resources & consultants working with Photon Entities and its business partners.

Photon strives to demonstrate the highest standards of ethical conduct. The company does not grant waivers to its conduct, conflict of interest, and compliance standards.





### 3. Our Business Principles

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**Photon constantly strives to excel and make a difference in all its pursuits.** While doing so, we seek to uphold the highest standards of excellence, ethics, transparency, and fairness unequivocally.



# 4. Our Policies at Work

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## 4.1 Diversity and Inclusion – Equal Opportunity Employer

Photon promotes a diverse, inclusive, and equal workplace both internally and externally. Every employee is expected to treat everyone with whom we have contact with dignity, courtesy, and respect. We hire, promote, and reward our employees based on their capabilities and skills. Gender, race, color, ethnic or national origins, marital status, family circumstances, age, disability, sexual orientation, political or religious belief are irrelevant to personal and team performance at work. Our employees and candidates have the right to work in a safe environment free from discrimination, bullying, or harassment.

We support and uphold human rights principles and international standards. We will not tolerate, engage in, or support the use of forced or child labor. This expectation extends to all our business partners and suppliers. Our employees are also subject to a thorough background verification process in accordance with established norms during and before their employment with us.

## 4.2 Working Conditions, Health and Safety

Photon complies with all applicable health and safety laws and regulations in all the jurisdictions in which it operates. Employment is in accordance with the minimum age requirements in the jurisdiction. We also comply with all applicable wage and labor laws and regulations governing employee compensation, reimbursements, taxes, and working hours

### 4.3 Social Media Communication and Posts

Photon uses Workplace for official communication on policies, events, and training sessions. Employees are advised to be professional, polite, and restrained while posting or commenting on the Workplace. Usage of abusive and offensive language and comments with political and religious overtones are strictly prohibited. Any violation thereof will invite disciplinary action under the social media policy hosted on Workplace.

The usage of Photon's name on social networking sites like Facebook, LinkedIn, etc., must also adhere to the guidelines outlined previously.

### 4.4 Timekeeping and Working Hours

Timesheet filling has to be done online using the Time Tracker tool.

A week is defined as five days (Monday to Friday) with a minimum of eight working hours per day (pro-rated appropriately in the case of part-time employees). Employees are advised to refer to the Timesheet policy hosted on Workplace for further information.



# 5. Harassment-Free Workplace

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We are committed to providing a safe and respectful workplace to all our employees, contractors, consultants, and third-party vendors. We firmly believe every human deserves an environment free from harassment and intimidation to be at their best at work. Our employees are expected to be sensitive and respectful to all cultural and social differences in whichever country they operate in. We have a zero-tolerance approach to harassment and intimidation.

Harassment is hereby defined as any offensive, disrespectful, and gross misuse of power and position, verbally or physically, in a way that compromises the person's dignity, respect, and self-esteem. Line managers and Human Resources are responsible for communicating this policy to employees and for investigating any complaints of harassment against any member of their team.

## 5.1 Prevention of Sexual Harassment

- In instances of sexual harassment, it is essential to remember that it is not the intention of the perpetrator that is the key in deciding whether harassment has occurred, but the impact landed on the victim mentally, physically, and emotionally. As a broad guideline, sexual harassment includes such unwelcome sexually determined behavior as:
  - Physical contact
  - A demand or request for sexual favors
  - Sexually colored remarks
  - Showing pornography
  - Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature



- Harassment may occur even when there is no intention of offending.
- The victim has reasonable grounds to believe that his/her objection to such unwelcome behavior would disadvantage him/her in connection with his/her work, including recruitment, employment, or allotment of work, promotion, or evaluation of his/her engagement in any Company activity.
- Where any such act(s) creates an intimidating/hostile/offensive work environment or affects the person's work performance.
- Grievance would be treated seriously and sensitively, having due regard to fairness, confidentiality, and privacy of all parties concerned. Anonymous complaints will not be entertained.
- All grievances must be addressed seriously, and the outcome of the process must be fair to all parties involved.
- The individual raising the grievance (the complainant) and the individual against whom the complaint is made (the respondent) will receive appropriate information, support, and assistance in resolving the grievance.
- No person would be victimized for having raised a complaint or being associated with a grievance.
- Grievances would be handled in a time-bound manner. The aggrieved should raise concerns as early as possible after the incident.
- All concerned are expected to participate in the grievance resolution process in good faith. Any baseless allegation unearthed during the due course of an investigation will have serious ramifications in terms of disciplinary proceedings.

## **5.2 Prevention of Sexual Harassment**

- Any aggrieved employee may complain of sexual harassment by sending a mail to the complaints committee on the id:  
report-harassment@photoninfotech.net
- The complaint should be sent in writing and will be dealt with in strict confidence by the committee members.
- The complaint should be sent at the earliest, but preferably within 30 days from the date of occurrence of the alleged incident.

- The Chairperson of the committee shall, within seven working days of the receipt of such complaint, personally meet or designate a member of the complaints committee to meet the employee who has made the complaint and record the statements made at such meeting. During this meeting, the employee is also expected to present any corroborative material/evidence to substantiate the complaint.
- After the meeting with the complainant, and on the satisfaction of the existence of a prima facie case of Sexual Harassment, the chairperson shall call for a committee meeting with not less than 50% of members present for the meeting within the next seven working days.
- During this meeting of the complaints committee, the person accused of the harassment will be called. The complaints committee will communicate the complaint to the person accused, and he/she will be given an opportunity to present his/her views of the situation.
- After having heard from both parties, the complaints committee shall thoroughly investigate (meet the complainant, enquire into the evidence provided, meet the witnesses, consult with experts, etc.) the complaint and make a report of its findings within the next two weeks. This report shall be submitted to the top Management Team.
- In case the complaint of sexual harassment is proven to be true, the accused person will be subject to strict disciplinary action, up to and including termination of employment.
- In case the complaint registered is found to be frivolous or false or was made with a mischievous intention, the complainant will be liable to face strict disciplinary action up to and including termination of employment.
- Any employee who is a part of the investigations shall not be victimized or subject to any unfavorable treatment.
- The victims of sexual harassment will have the option to seek his/her own transfer.
- The final decision on such complaints will vest in the Management and may differ depending on the merits of the case.
- Further details on Photon's policy on prevention of sexual harassment can be found on Workplace. Employees are expected to be fully aware and informed of this policy to desist from any deviant behavior.

### 5.3 Redressal Committee

- A committee is constituted for the purpose of resolving employee grievances related to sexual harassment. A woman employee will head this committee. At least 50% of the members of the committee shall be women. One team member will be from a third party/ NGO/ lawyer or any other individual/body of social standing competent to deal with the harassment issue. The details are available in the Prevention of Sexual Harassment policy available on Workplace.



# 6. Drug-free and Violence-free Workplace

Photon is a drug-free workplace. While at work and attending business-related activities in any location, you are strictly prohibited from using or being under the influence of alcohol or illegal drugs. Individual discretion and rational thinking are prescribed for any meeting or gathering outside office premises. Any instance of inappropriate behavior in an inebriated state will be treated as a violation of extended workplace ethics and will warrant disciplinary proceedings up to and including summary dismissal.

We strictly prohibit acts of hostility, intimidation, or violence towards others in the workplace and in places where our business is being conducted. You may not bring firearms, explosives, or any other weapons onto Company premises or any work-related setting, regardless of whether you are licensed to carry such weapons.





# 7. Anti-Corruption, Anti-Lobbying and Anti-Competition Regulations

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Photon operates a zero-tolerance policy for bribery and corruption. We do not offer or accept bribes or improper inducements, including facilitation payments, to secure business or to gain any advantage for either the Company or any individual. We actively refrain from any misleading or deceptive accounting or financial reporting practices.

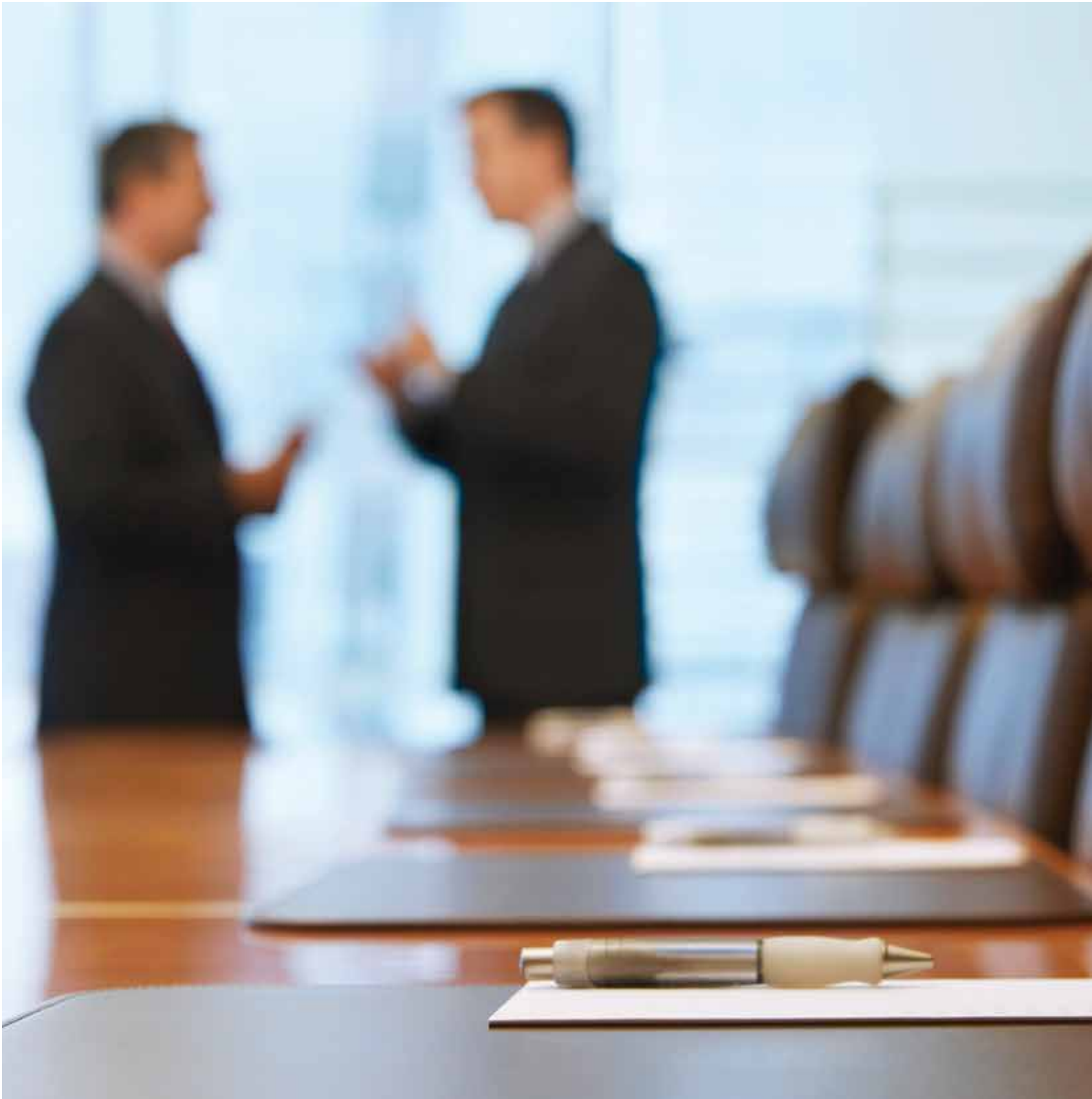
Photon neither endorses nor condones the usage of Photon's communication platforms or brand name/logo for political and religious purposes. Photon does not make any political or religious contributions in its official capacity.

Employees are expected to adhere to these guidelines and not exercise individual discretion. Employees are actively discouraged from pursuing practices contravening our agreements with our business partners, including matters in the realm of bidding, pricing, or any kind of unhealthy and unethical collusion. Any employee found to have indulged in embezzlement of money or laundering thereof will immediately attract the most stringent penalties. Any queries may be addressed to the Legal and Compliance department and the HR team.

As an organization, Photon is aware of and compliant with anti-trust and anti-competition regulations. We refuse to participate in anti-competitive behavior and will report such violations to the appropriate legal authority.

## 7.1 Political contributions

Photons actively discourage the usage of its brand name, image, and logo for any political purposes. Our business partners, suppliers, and employees should not make political contributions or provide gifts to any political party or elected official on behalf of or as a representative of the firm. There should be no lobbying on behalf of the firm or usage of firm resources for political activity.



# 8. Dress Code

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- The official dress code followed at Photon is Business Casuals
- All employees must be clean and well-groomed.
- All clothes must be work-appropriate. Clothes that are typical in workouts and outdoor activities aren't allowed.
- All clothes must project professionalism. Clothes that are too revealing or inappropriate aren't allowed.
- All clothes must be clean and in good shape. Discernible rips, tears, or holes aren't allowed.
- Employees must avoid clothes with Casual images/stamps/motifs that are offensive or inappropriate.
- The dress code policy is available on the Workplace for further information.

## 8.1 Exceptions

- Employees who work from the client site have to adhere to client norms with regard to the dress code.
- In case of scheduled client visits, formal business attire must be maintained, and the same will be communicated accordingly.
- Employees representing Photon in external events (University/College campuses, External training, seminars, etc.) are advised to check with the manager to see if the existing dress code is appropriate enough. When in doubt, formal attire is always more respectful.
- Any other exemptions must be approved by the AVP - HR on a case-on-case basis.

# 9. Gifts and Hospitality

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Maintaining high-quality professional relationships with our clients and candidates is essential to the success of our business. Sometimes, we provide or receive business courtesies, such as reasonable entertainment and modest gifts. However, we never allow these courtesies to affect our ability to make objective, professional decisions or give the perception that our objectivity has been compromised.

## 9.1 Gift Received

- Gifts may be received by employees only in accordance with these principles and procedures:
- Gifts must not be accepted that give the appearance of a past, present, or future conflict of interest and
- Gifts must not in any circumstances be accepted involving the transfer of money regardless of value (by cash or loan).
- In the case of awards/prizes won by employees by virtue of their employment at Photon, they must declare such a receipt within three days to the respective Solution Centre Head. The Head will then determine the ownership of the item.
- Where a gift is offered, and it is appropriate for an employee to accept the gift, the following must apply:
  - The recipient employee must declare the receipt within three days of receiving the gift by email to the respective Solution Center Head and [hrd@photoninfotech.net](mailto:hrd@photoninfotech.net)
  - The declaration must state
  - A full description of the gift
  - The date the gift was received
  - From whom the gift was received
  - Financial worth



## 9.2 Permissible Gifts

For the purposes of this policy, the definition of the term 'gift' includes:

- The transfer of money.
- The provision of services free of charge or at a reduced rate.
- Loans of money.
- The sale of virtual property with a sale price below proper valuation.
- Hospitality, including meals, entertainment and accommodation.
- Items that can be regarded as mementos, pens, stationery, devices, and the like, the manufacturer's wholesale value exceeds Rs. 500 at the time and place of purchase.

The term 'gift' does not include Gifts received from family members or personal friends offered in a purely personal capacity.



# 10. Criminal Antecedents and Disclosure

You must declare all your previous criminal records as part of your joining formalities. Our third-party verification agencies will use the same to complete your background verifications.

- You are arrested by Police or any government agency, or you have surrendered in court
- Any criminal case is filed against you
- You have been questioned by the Police or any govt. Investigation agency for suspected crime



# 11. Information Management and Security

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Photon has consistently demonstrated to suppliers, business partners, clients, and employees that we handle their information with care and integrity. The varied mediums of storage, including but not limited to print and electronic media, need to be held in accordance with established data storage and usage guidelines. Sensitive internal and restricted company information needs to be shared only on a need-to-know basis after consultation and approval from the local Management and HR with clients/suppliers.



## 11.1 Data Protection/Physical & Intellectual Property

The very nature of our business means we handle personal and confidential information about our employees, candidates, and clients every day. We have an important duty to respect this information and ensure it is protected and handled responsibly and only used for the purposes for which it is provided. We take our obligations under data protection and privacy laws across the world very seriously.

You must always:

- Photon takes responsibility for the assets entrusted during business, and the employees/contractors are expected to do the same.
- Only use personal information for the business purpose for which it was supplied (for example, the provision of recruitment services) with the written consent of the provider.
- Ensure personal information is secure at all times and is relevant, accurate, and kept up to date.
- Ensure that arrangements are in place to comply with data protection legislation.
- Ensure that Photon's trademark intellectual property is protected at all times and used only in connection with your work at Photon. Our trademarks should never be used in a defamatory manner. Any work produced by you using our resources belongs to Photon.

Handling client information is of utmost priority and sensitivity. Photon employees and contractors have a duty to safeguard any information pertaining to clients and are expected not to share the same in any form or shape.

## 11.2 Communication on behalf of clients

Employees should not communicate anything malicious to the interest of our clients or business partners. Any violation of the same will be dealt with the utmost severity.



# 12. Conflict of interest

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A conflict of interest is defined as a situation that impairs an individual's decision-making ability or performance of his/her job owing to personal or business relationships that adversely impact neutral and rational decision-making. Employees must disclose any such conflicts to the reporting manager and HR to avoid detrimental effects on the business and the individual's career at Photon.

Personal relationship in this context refers to workplace relationships involving a relative or any romantic liaison either within the workplace or with suppliers, contractors, or other agencies that Photon has a business relationship with.

Photon, as an organization, would report any conflict of interest identified to the respective stakeholders and escalate the same with the appropriate legal authority.



**Conflict**



**Interest**

# 13. Corporate Social Responsibility and Protection of Human Rights

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Photon actively engages in CSR activities that translate into meaningful and purposeful contributions to society and the environment in which we operate. Our transactions, dealings, and conversations are committed and centered on the maintenance, preservation, and upkeep of human rights as enshrined in the Universal Declaration of Human Rights and as per the provisions of the local Constitutional body.

We direct all our activities related to corporate social responsibility by

- Contributions towards society.
- Support is provided for individuals in terms of creating a shared value.
- Environmental sustainability efforts.



# 14. Legal Reporting and Compliance

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We comply with all applicable international and local legal and regulatory requirements in the countries where we operate.

All Company business records and communications shall be clear, truthful, and accurate. Employees, officers, and directors of the Company shall avoid exaggeration, guesswork, legal conclusions, and derogatory remarks or characterizations of people and companies. This applies to communications of all kinds, including email and "informal" notes or memos. Records should always be handled according to the Company's record retention policies.

Employees/Associates must promptly notify the organization in case of any media inquiries or regulatory requests, and the same needs to be raised with the respective supplier/client or vendor.

If an employee, officer, or director is unsure whether a document should be retained, consult the Legal team before proceeding.



# 15. Financial Reporting and Taxes

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Photon stringently adheres to records of bookkeeping in a way that is compliant with audit requirements. Our financial reporting relies on our accurate business records. There is a forthright representation of facts, and hence, we advise our employees to be accountable for the business records or client information that they handle in the normal course of business.

Photon is compliant with the applicable tax laws in the jurisdictions that we operate in, and we ensure accuracy in the tax-related information we report.

Employees should never falsify, omit, alter, or conceal any material business information or encourage anyone else to do so.

Employees are strictly advised to report any non-compliance, failing which strict disciplinary action will be taken.

Please reach out to the Legal and HR team in case of any queries or concerns.





# 16. Disciplinary Provisions

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Failure to comply with this Code or other company guidance documents will result in disciplinary actions leading to termination. Decisions taken by the top Management will vary depending on the severity of the misconduct. Contact your Human Resources representative for further queries in this regard. Some serious violations of the Code may result in termination, including:

- Improper use of alcohol
- Acts or threats of violence
- Accessing or storing sexually suggestive or explicit materials using company assets, including computers, mobile phones, or other electronic devices
- Falsification or misuse of company records

## 16.1 Nature of Indiscipline

- **Misconduct:** This includes behavior that is likely to bring the company into disrepute, damages the interests of company and staff, or causes loss of public or professional confidence; unauthorized removal or use of company property or assets; malicious or negligent damage to company property; conduct likely to offend decency; breach of security requirements; unauthorized absence from duty; neglect of duty and abuse of authority; disregard of reasonable instructions; being under the influence of drink or drugs at work; breach of the ISMS policies & procedures; unauthorized disclosure of confidential information.
- **Gross Misconduct,** of which the previous may include examples, will be misconduct deemed so severe that the Company can no longer tolerate the presence of the employee. Examples may include physical violence, theft or fraud, deliberate falsification of records, deliberate damage to Company property, serious incapability of being under the influence of alcohol or drugs at work, serious negligence that causes an unacceptable loss, damage, or injury, serious act of insubordination; serious breach of ISMS policies & procedures. An employee who commits such an act or omission will, therefore, be liable for summary dismissal - i.e., without notice.

- No disciplinary action shall be taken against an employee until the case has been fully investigated.
- At every stage in the process, the employee shall be advised in writing of the nature of the complaint against him/her and will be given the opportunity to challenge the allegations and state his/her case before any disciplinary action is taken.
- Disciplinary hearings should be arranged as soon as possible after the alleged misconduct, generally within five working days.
- The hearing will be chaired by the employee's immediate manager unless personally involved in the incident, in which case it should be the next most senior manager, the DM, senior HR Business Partner, and any witnesses called may be cross-examined by the employee or his/her representative.
- No employee shall be dismissed for a first breach of discipline except in the case of gross misconduct. Lesser penalties, for example, issue of warning letter, withholding of increments, demotion, or transfer, may be applied under appropriate circumstances.
- An employee shall have the right to appeal against any disciplinary penalty imposed.

If employees are found to have violated/breached any information security policies and procedures, it leads to disciplinary actions and termination of employment.

## **16.2 Disciplinary Action**

Depending on the gravity and nature of the misconduct, the following procedure will be adopted by the HR department in ascending order.

### **16.2.1 Verbal Warning**

Any supervisor may, at any time and at his/her discretion, reprimand an employee without notification, in which case there will be no entry made on the employee's disciplinary record. When a verbal warning is given, the supervisor must ensure that the employee being reprimanded is made aware of the existence and function of the Disciplinary Code. A verbal warning is usually issued where the offense is of a minor nature.

### **16.2.2 Recorded Warning**

This may be given for a repetition of an offense for which an unrecorded warning has been given, or it may be given for a first offense.

### **16.2.3 Severe Warning**

Given for a repetition of the same offense or similar offense during a period when a recorded warning is still in effect or for a first offense of a more serious nature.

### **16.2.4 Dismissal/Termination**

Dismissal is the final sanction and should be used:

- When other forms of disciplinary action have failed
- When an employee on a final warning commits a serious offense
- When the offence committed is of such a serious nature that it amounts to a serious breach or repudiation of the employee's contractual obligations
- in cases relating to dishonesty, e.g., theft, fraud, or corruption

In the case of any employee who is absent from work without permission for a period of three continuous working days or more. In this case, the employee will be dismissed in absentia after the third day if no reason for such absence is provided. Once an employee has been dismissed in accordance with the procedure contained in this Code, under no circumstances will he be considered for re-employment should he/she re-apply at a later stage. If it is discovered that a dismissed employee has obtained re-employment with the organization either inadvertently or through deception, his/her services will be terminated immediately.

### **16.2.5 Demotion**

Demotion is not an acceptable corrective action and is, therefore, not used as a punishment for a specific offense. It is used only where the employee is unable to meet the requirements of his present job but is suitable for continued employment in a lower capacity.

### **16.2.6 Transfer**

Transfer is not permitted as a tool for disciplining employees. A transfer shall only be effective in terms of the organization's Conditions of Employment and Service. Transfer, as the result of the outcome of a disciplinary action, will be considered in special circumstances.

