

	<b>Culture &amp; Ethics</b>	Doc No : <b>SME-EP-01</b>
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## **REVISION HISTORY**

08Jun.20	00	-	Initial Release	CEO	BOD	BOD
<b>Rev. Date</b>	<b>Rev</b>	<b>Section No.</b>	<b>Description</b>	<b>Prepared by</b>	<b>Reviewed by</b>	<b>Approved by</b>

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**Ethical Policy:**

SME is committed to encourage an organizational culture at highest standards of ethics and integrity at all levels with due diligence to prevent and detect unlawful and unethical conduct.

**Objectives:**

We have adopted this ethical policy described for the common standards to our companies, management and employees. The ethical policy has been designed to deter wrongdoing and to promote the values and principles outlined below. Adherence to these values and principles is expected from all of our employees.

**General Principles:**

**Integrity:** Management of SME is committed, that all employees work with full integrity, trust, fairness and professionalism. We respect the interests of our stakeholders (clients, employees, shareholders, suppliers, and government authorities) and of society as a whole. Integrity is the foundation of our business. We earn the trust of our colleagues, customers and shareholders by honoring our commitments, doing the right things for the right reasons, and by speaking up when we see something wrong.

We demonstrate integrity by:

- Putting safety first.
- Following the rules and not taking shortcuts.
- Being open, transparent and candid.
- Raising a hand if something is not right.
- Doing what we say we are going to do.

**Fairness:** We believe in courteous and respectful treatment of our stakeholders. We support equal opportunities and a work environment free from discrimination and harassment.

**Compliance:** We acknowledge the importance of all relevant laws, regulations, policies and standards, both internal and external, and comply with them.

**Responsibility:** Our commitment to our customers, our communities, and each other. We are accountable for ensuring safe operations, delivering on our commitments, and providing our customers and suppliers with the unparalleled service they deserve.

We demonstrate responsibility by:

- Ensuring that no one gets hurt, and nothing gets harmed.
- Setting clear expectations and delivering results.
- Being gracious when things go well, and accountable when they do not.
- Taking ownership of our commitments and asking for help when needed.
- Finding better ways to get the job done.


We recognize the following areas of responsibility and set forth the following goals:

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- To customers: to provide products, services and innovative solutions which meet the dynamic needs of our customers. We offer appropriate convenience and value in terms of price and quality. We deliver what we promise.
- To employees: to offer interesting and challenging positions and competitive remuneration, provide equal opportunities and promote personal and professional development.
- To shareholders: to protect shareholders' investments and provide a sustainable return.
- To suppliers: to seek mutually beneficial relationships with suppliers and joint venture partners and promote the application of the Code of Conduct principals in doing so.
- To government authorities: to strictly observe and comply with the relevant laws, rules, regulations, codes and standards of good practice of the countries in which we operate.
- To society: to conduct business as a responsible corporate member of society at large and in the communities in which we operate, and carry out the commitments we make to adhere to international conventions or codes.

Each employee is responsible for:

- abiding by all laws, rules and regulations as well as the internal policies of the SME, including the values and principles set forth in the Code of Conduct;
- being familiar with guidelines, manuals and emerging best business practices relevant to their duties and implementing them conscientiously to the best of their abilities;
- raising questions and, ultimately, objecting if concerned that a standard of conduct is not met;
- committing to teamwork and contributing his or her best to reaching common goals;
- contributing to an atmosphere of trust, professionalism, performance, pride and self-esteem;
- acting at all times in good faith, responsibly, with due care, competence and diligence, and without any misrepresentation of material facts;
- protecting all assets and resources of SME and promoting their efficient use;
- acting at all times in an ethical way, including the ethical handling of actual or apparent conflicts of interests;
- dealing fairly with our customers, suppliers, competitors and other employees and never taking unfair advantage of anyone through unethical behaviour;
- reporting violations of law or other misconduct in accordance with the SME's policies and procedures so that such issues can be properly addressed;
- As managers, striving to achieve leadership competencies in setting a clear, customer focused direction, setting an example in personal commitment, being credible and keeping promises, properly supervising reporting employee, monitoring compliance and creating an organizational environment in which employees can excel.

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- Committed to capture record and compile the truthful and factual data being generated at various business processes, activities and transactions.
- Never get involved in any fraudulent practices involving any data compilation and reporting. Appropriate confidentiality also will be maintained throughout the dealing with the data.

**Business Integrity:**

We honour our commitments and promise only what we can deliver.

**Business Principles:**

We are committed to maintaining profitability, a strong financial foundation and appropriate risk levels in order to meet our responsibilities. We do not sacrifice compliance with laws and commitment to our responsibilities or take undue risk for the sake of profits.

**The Community:**

SME committed to adhere all laws and rules laid out for CSR (Corporate Social Responsibility) activities in letter and spirit. Where appropriate, we encourage employees to engage in community activities and wherever possible we support organizations and institutions dedicated to social, charitable, educational, humanitarian and cultural causes.

**Communication:**

Management take the responsibility, not only at the HR level but More frequently on emails and take sessions, where it will be again and again reinforced that any breach of integrity at any level is not acceptable. Implementation and helping to understand the importance to be ensured by:

- Immediate Supervisors
- Quality Management System
- Human Resource Development
- Management

Through:

- Orientation Program
- Training & Education
- Taking commitment through Signing the Policy Document for acceptance and understanding the compliance of ethical policy.

**Reporting of Violations:**

Any violation of the Integrity Policy must be reported to the relevant authority.

Level-1	Level-2	Level-3	Level-4
Immediate Supervisor	HRD	QMS Head	Top Management

- Hiding the policy violation leads as violation of ethical policy itself.
- Threats or retaliation against anyone who reported integrity Policy violation leads as violation of ethical policy itself.

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**Supervision & Monitoring:**

We stand committed to evaluate and approve the truthfulness and appropriateness of collected data through layered screening before taking any decision on that basis and sharing with Stake holders. Internal Audit will ensure that the Policy be monitored and audited annually for effectiveness.

Violation of the ethical Policy may lead to:

- Show cause notice for explanation
- Legal action
- Termination of Job
- Legal action and Termination of job

**Management Reviews:**

Management shall review the effectiveness of policy as below assessment reports:

- Completed Trainings
- Compliance Violations
- Improvement in the policy
- Action taken