

Code of Conduct Policy

VERSION 1.0

Policy Name	Code of Conduct		Policy No.	7	
Effective Date	01-04-2022	Date of Last Revision	18-02-2022	Version No.	1.0
Administrator Responsible	C-Suit	Contact Information	CEO@raceecochain.com		

Revision History

Version History	Date of Release	Prepared By	Reviewed By	Approved By	Details of Changes
1.0	17-03-2022	Ms. Rita Kotnala	Mr. Ravi Madan / Mr. Bunty Parwani	Board of Directors	NA

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1. Introduction

At RACE, we believe in running and developing our business in a sustainable way, for the benefit of those who work in it. We believe that our business interests are best served by behaving responsibly towards all of our stakeholders, clients, staff, suppliers and the communities in which we operate.

We believe that we have a responsibility to adhere to the highest standards of behaviour and care. As an international business, we recognize that laws vary from country to country. Compliance with those laws is necessary, but never sufficient. Our Code of Conduct Policy therefore sets out the universal standards of individual and collective behaviour that we seek to apply to all of our activities around the world.

This policy has to be read in conjunction with other related policies covered in the various clauses mentioned below.

2. Scope

Code of Conduct is a set of principles characterizes how an organizations worker should follow on an everyday basis within and outside the premises. It mirrors the association's day by day tasks, beliefs and culture. Though we promote freedom of expression and open communication, we still expect each employee to follow our Code of Conduct. Our Code of Conduct applies to all our employees regardless of employment agreement, rank, or location. The Code also applies to third parties, such as consultants, advisor, agents, suppliers, and others acting on the Company's behalf.

The employees are required to abide by the requirements of this policy while they are employed with RACE during office hours and/or business meetings and official visits.

The employees are required to sign a declaration that they have gone through this policy.

3. Effective Date

This policy is effective from April 1st '2022

4. RACE Code of Conduct includes:-

A. Business Integrity

RACE ECO CHAIN LTD is a "Limited" company which automatically puts added responsibilities on our shoulders. We ought to maintain the highest standards of business integrity and require our suppliers and clients to do likewise. There shall be no improper advantage sought, including the payment of bribes, to secure the delivery of goods to RACE, or to influence the outcome of an independent audit or review. This includes audits that are commissioned directly by the supplier, or on behalf of other customers.

Both suppliers and Units manufacturing goods for RACE must also commit to making sites and corresponding documents and personnel available for periodic audit or inspection. It is expected that RACE representatives, including third-party auditors, be given complete and accurate information to enable them to make a full assessment of a Unit's level of compliance.



B. Work Atmosphere

To work effectively, all of us need a healthy and safe work environment. We provide a work environment free of coercion, discrimination, and harassment. Therefore, respect, inclusiveness and shared ethical values are at the heart of our core values. Irrespective of your department and rank, you should conform with our equal opportunity policy in all aspects of the work, from recruitment and performance evaluation to interpersonal relations. Remember, all forms of substance abuse as well as the use or distribution of drugs and alcohol while at work is strictly prohibited.

C. Bribery and Corruption

The Bribery Act 2010 was enacted on 8 April 2010 and its main provisions commence in July 2011. Under the Act, the main offences are bribing another person, being bribed, bribing a foreign official, and a corporate offence of failing to prevent bribery.

Anti-bribery and anti-corruption laws apply to all RACE employees. RACE employees must not under any circumstances make or accept any offers of bribery (this is widely defined and includes offers of services, money, gifts or entertainment). If you are in any doubt regarding this, you should speak to a member of the Management. Any actual or suspected bribery must be reported to the Management.

Any employee who is suspected to have breached our policy in this regard will be subject to a disciplinary investigation, which may lead to cessation of his/her employment.

Any report by an employee of actual or suspected bribery will be treated in confidence and (provided that any such report is made in good faith in support of RACE commitment to Zero Tolerance towards bribery and corruption), the employee shall be protected from any reprisals in connection with the report.

D. Child or Forced Labour

RACE is committed to the elimination of all forms of forced and compulsory labour, and to the effective elimination of child labour (below 18 years). Each RACE employee is expected to be aware of and abide by these commitments, and to never personally hire child or forced labour. Employees should also be alert to any evidence of child or forced labour in operations linked to the system, and report them to the Management.

E. Health, Safety and Environment

The Company shall make all arrangements to take care of the health of its employees and also make adequate provision for safety at the work places.

The Company shall also abide by the concerned regulations protecting the environmental concerns.

F. Conflict Of Interest

An employee will prevent/avoid Conflict of Interests between private activities and conduct of Company businesses. Conflict of interest does not relate exclusively to matters concerning financial transactions and the transfer of economic benefit. While financial activity is important, it is not the sole source of conflict of interest situations. It is impossible to foresee every situation that could give rise to a real, apparent or potential conflict of interest. When in doubt, employees should refer to the requirements found in this Code to guide appropriate action. Employees can also seek guidance from their manager. Employees are responsible for taking all possible steps to recognize, prevent, report, and resolve any real, apparent or potential conflicts of interest between their official responsibilities and their private affairs.

Employee on separation from the company can not join any business partner and/or competition of the company for a period of 6 months.

G. Compliance With Law

We comply with all laws, whether local, national or regional. All our employees and those acting on our behalf must protect the Company's legality. They should comply with all environmental, safety and fair dealing laws. Violations of law can result in significant harm to the Company, including financial penalties, denial of government contracting privileges, imprisonment for criminal misconduct and damage to our business relationships and reputation. People associated with us are expected to be ethical and responsible when dealing with our company's finances, products, partnerships, and public image.

H. Protection Of Company Property

All employees should treat our Company's property, whether material or intangible, with respect and care. Employees shouldn't misuse Company equipment or use it frivolously and should respect all kinds of incorporeal property. This includes trademarks, copyright and other assets including intellectual property. Employees should use them only to complete their job duties. Additionally, the use of our assets for individual profit or any unlawful, unauthorized personal or unethical purpose is prohibited.

I. Our Deliverables

Employees must compete fairly and ethically for all business opportunities. We serve our clients, regardless of role focusing on the best interests of our clients. Employees involved in the sale of our products and services must ensure that all statements, communications and representations to clients are accurate, complete, and truthful. Similarly, you must not make or attempt to make any unauthorized commitments on the Company's or our client's behalf. Do not inappropriately implicate or involve the Company in your disputes with clients or others.

J. Financial Integrity And Accounting

Accurate and reliable financial and business records are of critical importance. You must not engage in any actions that could result in conveying false or inaccurate financial information to our Company or our clients. You must ensure that all submissions you make to the Company or the client on our behalf are complete and accurate.

K. Company Confidential Information

For any Company, its confidential information is a valuable asset and every director, employee, and agent of the Company must protect it. Confidential information includes all non-public information. It also includes personal information obtained from any source in the course of business. An important element of such protection is maintaining the confidentiality of confidential information and other proprietary information.

L. Responsible Social Media Usage

We expect you to comply with applicable laws and government guidelines governing social media. When using any form of social media, you must comply with this Code of Conduct. You must not disclose any confidential information about the Company or any of its employees, contractors or third-party vendors. We do not encourage you sharing and being part of any political or social propaganda on behalf of the Company unless specifically asked to do so.

M. Personal Appearance and Conduct

All employees must follow our dress code and personal appearance guidelines. Also, it is imperative that each employee behave in the acceptable manner only through all type of communications: Verbal, Non-Verbal, Gestures, Remarks, Passing Comments, Opinion, Written or otherwise. Each employee is expected to use their basic learning, IQ and EQ while they operate. From Choice of Words, to Tone to Surroundings and overall conduct, YOU ARE RESPONSIBLE. We at Race only hire 18+ years of individuals and hence expect each employee to behave like Adults.

N. Job Duties And Authority

All employees should fulfil their job duties with integrity and respect toward customers, stakeholders, and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

O. Absenteeism



Employees should follow their schedules. We can make exceptions for occasions/emergencies that prevent employees from following standard working hours or days. But, generally, we expect employees to be punctual when coming to and leaving from work. Always keep your Manager informed of your delayed reporting to work or absenteeism from work.

P. Communication

All employees must be open for communication with their colleagues, supervisors or team members. We all must remember that Communication is a Two – Side Traffic and must be embraced.

Q. Policies

All employees should read and follow the Company policies. For any queries, they should ask their managers or Human Resources (HR) department.

R. Company's Intellectual Property

All employees must not share the sensitive data and personal data of employees of the company with outsiders.

S. Disciplinary Actions

Our Company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our Code of Conduct. Disciplinary actions will vary depending on the violation.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behaviours. Possible Consequences for the breach of code of conduct are listed below and are not limited to:

1. Demotion
2. Reprimand
3. Suspension or Termination of Services
4. Detraction of Benefits for a Definite or Indefinite time.

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P.S. This policy can undergo changes and modifications from time to time. It is expected from the employees that they remain updated with the latest version available online.