



KINDUZ

Conflict of Interest and Business Ethics policy
<http://www.kinduz.com/>

KINDUZ Business Consulting Pvt. Ltd.
admin@kinduz.com

Address:5-62/9/22-B, V.V. Nagar, St.
No.8, Habsiguda, Hyderabad,
Telangana, India. ZIP: 500 007
Office Phone: +91-40-40045614
Office Fax: +91 22 67388884

CONFLICT OF INTEREST AND BUSINESS ETHICS POLICY

OVERVIEW

This policy is designed to prevent "conflict of interest" situations, including situations in which the organisation's associates do anything which conflicts with interests of the organisation or anything which could be construed as possibly being in conflict with such interests.

SCOPE

This policy applies to all Interns, Employees, Contractors and Sub Contractors (here in after referred to as associates) of the organisation.

POLICY

The organisation believes that credibility, integrity and trustworthiness are critical components of the current and future success of its operations. The organisation is committed to upholding high ethical standards in all of its global operations. Each associate owes a duty to the organisation to act with integrity and good faith.

The following are some examples which constitute conflict of Interest:

1. OUTSIDE EMPLOYMENT

- 1.1. Significant ownership interest in any client, supplier or competitor or any other organization while working for the organization as an associate of the organisation.
- 1.2. Any independent employment relationship, directly or indirectly, with any client, supplier or competitor or any other organization while working for the organisation.
- 1.3. Be engaged, concerned or interested directly or indirectly with any other business or occupation without the prior written consent (which may be refused) of the organisation while on tour or on leave or employed with the organisation except while on deputation to other organization with the approval of the competent authority.
- 1.4. If any associate would like to become a non-executive director of another company, he/she must also obtain the prior written consent and approval of the Director/C.E.O. of the organisation. This may not preclude the associate from holding or acquiring any other company's shares or other securities which are publicly listed

(subject to the limitations set forth in item (i) above and subject further to compliance with the rules on insider trading) or deal in any recognized stock.

2. CONDUCT WHEN OBTAINING BUSINESS

- 2.1. The associate of the organisation shall not receive or give any money, accept non nominal gifts or accept excessive entertainment from any company or individual with which the organisation has current or prospective business dealings.
- 2.2. The associate shall not show any discrimination, being in the position of supervising, reviewing or having any influence on the job evaluation, pay or benefit of any close relative and/or close friend or anyone who is an associate of the organisation.
- 2.3. The associate shall not show any undue favour being in the position of procuring, for the organisation, products or services from any company or physical person, with whom the associate has a personal or family interest or otherwise.
- 2.4. The associate also shall not bring pressure on the organisation management to procure any product/services from any individual or company or business establishment in which the associate has a personal or family interest or otherwise.

3. CONFIDENTIAL INFORMATION

The associate of the organisation shall not use or disclose any confidential information about the organisation and or its clients/vendors/associates or parties to any person or entity for personal gain (except to the extent as may be necessary in carrying out officially permitted role) and, more generally, using the employee's position for personal gain.

4. BORROWINGS

No associate (or his/ her immediate family) shall make any borrowings or receive credit from third parties on a favoured basis on the organisation's name, unless approved and authorized by Director/C.E.O. the organisation. Borrowings between associates of the organisation are highly discouraged. The associate shall be entirely responsible for all borrowings and illegal transactions done for self or family and the management of the organisation organization will not be a party and not liable for any repayments arising out of such dealings.

5. SELLING

The organization does not allow any other form of solicitation of associates by outside/inside people on the company's premises including the sale of raffle tickets etc. without prior approval of the director/C.E.O. The sale /purchase of such items, if any by any associate shall be done outside the organization's/ client's premises and out of working hours. The organization has no responsibility in all such cases.

The foregoing list is non-exhaustive.

6. ASSOCIATES'S RESPONSIBILITY

- 6.1. The associate must notify the manager if he/she has any relationships which could create or appear to create, a conflict of interest. The obligation is upon the associate to raise such a conflict of interest, if the associate is unsure as to whether any activity amounts to a conflict, the associate shall raise it with the manager, who will then decide, whether it amounts to a conflict in any event. In certain circumstances/cases, the organization may at its discretion, provide consent for such activity.
- 6.2. If any project assignment results in compromise of the associate's personal beliefs or values he/she shall bring it to the notice of higher authority/manager and discuss in the first instance to establish what any other options are available in the best interest of the organisation.
- 6.3. If the associate becomes involved in or are otherwise made aware of such conflict of interest, the same should be brought to the notice of the manager/C.E.O./Director without fail in the first instance to avoid complications

7. VIOLATION

In case of any violation of the above set forth policy the concerned and involved associate(s) shall be subject to disciplinary action as deemed necessary by the organisation management.

VIOLATION REDRESSAL MECHANISM

1. Questions regarding the compliance to the stated policy should be directed to the Secretary.
2. Associates are encouraged to report violation or any issues that are related to the policy with the respective manager or with the Secretary.
3. There would be a disciplinary process for any associate/ associates who violate this LASSIB policy and procedures. Action taken would include, but not limited to:
 - Verbal or written reprimand
 - Referral to appropriate counselling
 - Withholding of a promotion based on behavioural issues
 - Termination of employment.

EFFECTIVE DATE:

This policy is effective from 1st January 2009