



BUSINESS CODE OF CONDUCT POLICY

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1. Objective

The objective of this Code of Conduct Policy is to ensure that each & every employee of the company is aware of the acceptable conduct and ethical behavior, in total alignment with Anvaya Technologies LLC's Principles and highly valued culture.

2. Coverage

This policy applies to all employees, contractors, vendors, clients, and any other individuals who interact with Anvaya Technologies LLC. It covers all work-related settings and activities, including company premises, off-site locations, company-sponsored events, and business travel.

3. Guidelines

Anvaya Technologies has employees of different nationalities, cultures and religious beliefs. This calls for commonly agreed ethical practices and standards. Anvaya Technologies employees are subject to various local laws and regulations. Anvaya Technologies policies are designed to comply with all applicable international and local laws.

The Code of Conduct, in addition to providing guidelines on day-to-day conduct while on employment, also describes how Anvaya employees should behave in situations that pose discomfort or issues of moral dilemma that call for support and clarification.

The guidelines given below are to help employees on a day-to-day basis. This list is not all inclusive and various other situations may arise that require critical review and action from the company.

4. General Standards of Conduct

Anvaya Technologies LLC aims and believes to build an environment encompassing the best practices in the industry thereby resulting in a culture which is highly valued, respected and admired. The company has come out with a code of conduct for their employee which imbibes all these values. All employees of Anvaya Technologies are expected to strictly adhere to this Code of Conduct.

Anvaya Technologies LLC believes in conducting its affairs by adopting the highest standards of professionalism, honesty, integrity and ethical behavior, in a fair transparent manner.

Our employees are expected to conduct their business dealing honestly, openly, fairly, diligently and courteously and in a manner that enhances the stature of the Company. All employees should be aware of and abide by all policies and procedures applicable.

5. General Behavior and Conduct

Anvaya Technologies LLC Employees are expected to demonstrate professionalism, integrity, and respect in all interactions and activities. This includes adhering to company policies, maintaining confidentiality, and treating colleagues, clients, and stakeholders with courtesy and fairness. Professional conduct also encompasses punctuality, accountability, and the commitment to perform duties to the best of one's ability. Unacceptable behaviors such as harassment, discrimination, and any form of unethical practices are strictly prohibited. By upholding these standards, employees contribute to a positive, productive, and inclusive work environment.

6. The Codes

6.1. Self-esteem enhancing Work Environment

- It is expected that all employees treat the people they interact with, both within and outside, with respect and in a manner enhancing their self-esteem, pride and dignity.
- All employees will work together in a collaborative manner as a well-knot team towards the achievement of business goals, putting the interests of the team and the Company before their own. They will work in a manner that is open, honest, straightforward and fair, respectful of the views of others and actively interacting with team members. Employees will share required information, learn from each other, help one another to develop and grow, and contribute towards making the experience of working at Anvaya Technologies an enjoyable one for every member.
- Anvaya Technologies is committed to provide a work environment free of unlawful harassment. Sexual harassment and harassment based on age, race, religion, cast, ethnic origin, disability, marital status, sexual orientation or any other basis is prohibited. All employees should conduct themselves in such a manner which enhances dignity and should not cause any harassment to other employees. This also includes acts that are unwelcome – unwelcome physical, verbal or non-verbal conduct of sexual nature”, making “sexually colored remarks “. Our policy of sexual harassment spells out further details on this type of harassment elaborately.

6.2. Safety and Security

All employees are governed by safety and security policy. Employees should strictly adhere to the policy and ensure that safety and security is followed at all times while at office or on road or at any other location.

6.3. Substance Abuse Policy

Anvaya Technologies LLC is committed to promoting the wellbeing of its staff by creating a safe and healthy work environment. Additionally, we recognize the negative impact that alcohol and drugs may have upon an individual’s ability to work safely and correctly. All employees are governed by the substance use policy and violations may lead to even dismissal from service.

6.4. Public Statements and Social Media Policy

At Anvaya Technologies, we are dedicated to upholding a professional and respectful presence in all public statements and on social media. Employees are expected to align their communications with our core values of innovation, integrity, and respect. All public statements must be approved by the communications department to ensure consistency and accuracy. On social media, employees should clearly distinguish personal views from those of Anvaya Technologies and avoid sharing confidential information or engaging in discussions that could harm the company's reputation. Violations of this policy may result in disciplinary action, up to and including termination.

6.5. Respect and Responsibility

We are committed to creating a respectful, responsible, and harassment-free workplace. All employees are expected to treat each other with dignity and respect, fostering a professional and inclusive environment. Harassment of any kind, including but not limited to, sexual harassment, bullying, discrimination, or any behavior that creates a hostile work environment, will not be tolerated. Employees are encouraged to report any incidents of harassment to their manager, HR, or through our confidential reporting system. All complaints will be promptly and thoroughly investigated, and appropriate action will be taken. Violations of this policy may result in disciplinary action, up to and including termination.

6.6. Modern Slavery and Human Trafficking

Anvaya's robust framework aimed at preventing, detecting, and addressing modern slavery and human trafficking within an organization's operations and supply chains. This policy enforces a zero-tolerance approach to forced labor, servitude, and exploitation. It includes measures for due diligence & risk assessment to ensure adherence to ethical labor standards. We mandate training programs for employees and suppliers and establishes clear reporting mechanisms to enhance awareness and enable the identification and reporting of any violations. Anvaya commits to upholding human rights, fostering ethical practices, and contributing to the global effort to eradicate modern slavery and human trafficking.

6.7. Principle of Equal Opportunity

We will recruit people solely on merit and reward people based on their performance and potential without discrimination on grounds of age, race, caste, ethnic origin, religion, political and other opinion, gender, sexual orientation, marital status, or disability/disease unrelated to the role. No employee of the group will discriminate between other based on any of the above grounds or based on any other personal prejudice or biases.

6.8. Conflict of Interest

- No employee, including family or other relationship will be involved in any arrangement which might daunt his/her from acting in the best interest of the Company.
- No employee or his/her family member will act as an intermediary on behalf of a third party in transaction involving his/her company.
- Employees or their family members will not have any financial interest in any outside enterprise which is currently doing business or seeks to do business with or is a competitor of his/her Company. Sometimes it may be possible that the employee comes to know that his/her company is doing business with any organization/individual with which he/she is directly or indirectly involved at a later date (for example, through a relative) in which case he/she is obliged to bring it to the notice of his Department Head or Head- HR through a mail and HR may advise the employee accordingly depending upon the dealings.
- No employee shall solicit or promote any personal/public cause or organization/association during working hours. As a rule, when you are in doubt, seek clarification from your Manager or the Head of HR.

6.9. Fair Competition & Anti-Trust

Anvaya Technology ensure full compliance with antitrust laws and to promote a competitive market environment. Employees must avoid any actions that could restrict competition, such as price-fixing, bid-rigging, market allocation, or forming monopolies. The policy strictly prohibits any agreements or discussions with competitors regarding pricing, market divisions, or other strategies that could limit competition. Employees are encouraged to attend training sessions on these laws and to remain vigilant in recognizing and reporting any potential violations. By adhering to this policy, we maintain our commitment to ethical business practices, foster a healthy competitive market, and uphold consumer trust and confidence.

6.10. Sustainable Procurement

At Anvaya Technologies, sustainable procurement is a core principle that guides our sourcing decisions to align with our commitment to innovation, environmental stewardship, and social responsibility. We prioritize suppliers who use eco-friendly materials, adhere to fair labor practices, and contribute positively to their communities. By integrating these sustainability criteria into our procurement processes, we not only ensure long-term value and efficiency but also enhance our reputation, mitigate risks associated with supply chain disruptions, and drive forward-thinking solutions. This approach reflects Anvaya

Technologies' dedication to fostering a sustainable future while meeting our business objectives and stakeholder expectations.

6.11. Privacy, Preserving & Protecting Assets

- Protecting the Company's assets is a key responsibility of every employee. Care should be taken to ensure that assets are not misused, misappropriated, loaned to others, or sold or donated or mortgaged, without appropriate authorization. Employees may not use Group/Company assets for personal use, nor may they allow any other person to use Group/Company assets. Every employee is personally responsible for all Company funds over which he or she exercises control. Company funds must be used only for business purposes. Every employee must take responsible steps to ensure that the Company receives good value for Company funds spent and must maintain an accurate and timely record of expenditure.
- We deal with confidential data of our customers and are covered by non-disclosure clause. All employees need to ensure Privacy and Protection of data of our clients. Information which we capture, relating to clients, should not be shared with anyone else other than those who are authorized. Employees are advised to go through the policies to be aware of the policy and the consequences for any breach/violation.
- All employees sign a Confidentiality and Nondisclosure Agreement which details their confidentiality obligations to the Company. Employees have access to significant amounts of company information that may not be available to the public, and we should preserve the confidentiality of information obtained in the Company's service. Information of confidential, private and sensitive nature must be used responsibly and controlled and protected to prevent its prohibited, arbitrary or careless disclosure.

6.12. Cyber Resilience

Anvaya Technologies is deeply committed to maintaining robust cyber resilience to safeguard our digital assets and ensure the integrity of our operations. Our Cyber Resilience Policy serves as a comprehensive framework for identifying, assessing, and mitigating cyber threats. Through regular risk assessments, proactive measures such as stringent access controls and encryption, and the implementation of a robust incident response plan, we strive to minimize the risk of cyber incidents. Additionally, continuous employee training and awareness programs are integral to enhancing our workforce's understanding of cybersecurity best practices. We also prioritize third-party risk management, holding vendors and partners to high cybersecurity standards. Our policy is a living document, subject to regular review and updates to remain agile in the face of evolving cyber threats and technological advancements. By adhering to this policy, we aim to uphold the resilience of our digital infrastructure and ensure the continuity of our business operations.

6.13. Sanctions and Trade Controls

Anvaya's code follows UAE outlined framework for compliance with international and local sanctions, export controls, and trade regulations. Our policy ensures that the organization adheres to all applicable laws and regulations concerning trade restrictions imposed by the UAE and International bodies. It includes procedures for screening transactions, customers, and partners against sanctioned party lists, obtaining necessary licenses for controlled goods, and maintaining accurate records of all trade activities. It also includes full compliance with US government sanctions on specific companies, firms, and individuals, and observance of all related restrictions. The policy mandates regular training for employees to stay informed about current regulations and emphasizes the importance of reporting any suspicious activities. Our organization commits to lawful and ethical trade practices, mitigating the risk of legal violations and contributing to global security and compliance standards.

6.14. Government Contracting

At Anvaya Technologies, we adhere to stringent standards to ensure compliance, integrity, and transparency in our business dealings with government agencies and entities. When interacting with these agencies and entities, additional and often stricter laws and regulations may apply, compared to those governing our non-government customers and suppliers. It is our duty to comply with these laws and regulations whenever they are applicable.

We do not offer gifts, gratuities, payments, or any other incentives, either directly or indirectly, to government officials to influence decisions, secure or retain business for Anvaya, or obtain any special treatment. For more details, please review our [Anti-Bribery and Corruption Policy](#).

6.15. Accepting Gifts and Entertainment

- No employee will offer any gifts, favors or entertainment to others that are not consistent with customary business practices.
- Employees should never seek or obtain any favors (financial or non-financial) from any customer. Anvaya Technologies strongly deplores any such unethical act. We would like to caution all that such acts are punishable, and the punishment may include even dismissal from service. As a principle, avoid accepting gifts in kind or cash or enjoy any special privileges from any business associate.
- Complimentary/sweets may be accepted only on festive occasions/new year/special anniversaries, if it serves the purpose of maintaining proper and good relationship with our regular business associates; however, the value of such complimentary should not exceed AED 100/-.
- Invitation to occasional lunches/dinners hosted by our business associates may be accepted, if it serves the purpose of enhancing the relationship, after informing the immediate superior. It is essential that in the event of an employee accepting complimentary (upto value specified AED 100) or attending an occasional lunch/dinner; there should be no scope for this being constructed as having influenced the judgement of the recipient.

6.16. Financial Integrity

Anvaya's Policy establishes guidelines for the accurate, complete, and timely maintenance of the organization's financial records. We ensure compliance with applicable laws, regulations, and accounting standards, promoting transparency and accountability. It requires all financial transactions to be documented systematically, with detailed records that are easily accessible for audit and review. Our policy mandates regular reconciliations, adherence to internal controls, and secure storage of accounting records to prevent unauthorized access and loss. Additionally, it includes provisions for retaining records for the legally required period and disposing of them securely when no longer needed. By adhering to this policy, the organization ensures the integrity of its financial reporting, supports informed decision-making, and upholds stakeholder trust.

6.17. Whistleblowing

We are committed to fostering a culture of transparency and accountability. Our whistleblowing policy provides a safe and confidential channel for employees to report any unethical, illegal, or suspicious activities without fear of retaliation. Employees are encouraged to report concerns such as fraud, corruption, harassment, or any other misconduct directly to the designated whistleblower officer or through our anonymous reporting system via whistleblower@anvayatec.com. All reports will be thoroughly investigated, and appropriate action will be taken based on the findings. We ensure that whistleblowers are protected from any form of retaliation, discrimination, or disadvantage as a result of their disclosure. Non-compliance with this policy or retaliation against whistleblowers may result in disciplinary action, up to and including termination. Please review our [Anti Bribery and Corruption policy](#) for additional information.