



POLICY ON EMPLOYEE CODE OF CONDUCT & BUSINESS ETHICS



TABLE OF CONTENTS

Topic	Page Number
1. Preamble	2
2. Scope	3
3. Manager/Supervisor's Responsibilities	3
4. Employee's Responsibilities	3
5. Attendance and Punctuality	3
6. Dress and Appearance	4
7. Personal Behavior	4
8. Fairness and Equity	5
9. Transparency and Auditability	5
10. Use of Facilities and Equipment	5
11. Confidentiality and Use of Official Information	6
12. Record Management	6
13. Conflict of Interest	7
14. Financial Interests	8
15. Promotion and transfer within company	8
16. Employee / Client Boundaries	8
17. Statutory Compliance and Lawful— Law of Land	8
18. Policies	9
19. Harassment	9
20. External Employment	10
21. Ownership of Products and Copyright	10
22. Grievance Handling	11
23. Information Technology Policy	11
24. Acceptance of Commissions, Gifts or Benefits	12
25. Breaches of Code	13
26. Terminology	13
27. Supervisor Code of Conduct - Statement	14
28. Employee Code of Conduct - Statement	15

1. Preamble:

Committed Cargo Care Limited firmly believes that sustained growth can only be fostered through developing a work ethic founded upon the core values of integrity, transparency, professionalism, empowerment and accountability. Company endeavors to uphold and nurture these core values in all facets of operations.

The Code of Business conduct and Ethics helps to ensure compliance with legal requirements and our standards of business conduct as approved by the Senior Management from time to time. All the applicable employees at all band and members of management are expected to read and understand this Code of Business conduct and Ethics, uphold these standards in day to day activities, comply with all



applicable policies and procedures and ensure that all employees of the Company are aware of, understand and adhere to these standards.

2. Scope:

No code or policy can anticipate every situation that may arise. Accordingly, this Code is intended to serve as a source of guiding principles for all employees of Committed Cargo Care Limited provides clear guidelines and standards for the appropriate behavior expected. Each director, officer and employee is encouraged to bring questions about particular circumstances that may implicate one or more of the provisions of this Code to the attention of the Managing Director, who may consult with inside or outside legal counsel as appropriate.

3. Managers/Supervisors Responsibilities:

Managers are responsible and accountable for:

- Undertaking their duties and behaving in a manner that is consistent with the provisions of the Employee Code of Conduct.
- Informing employees in their teams about the Employee Code of Conduct, relevant policies, procedures and minutes.
- Providing appropriate training and/or performance counselling to ensure the required standard is met.
- Reporting any departure from the Employee Code of Conduct by themselves or others.
- Acting consistently and fairly in dealing with behavior that breaches this code.
- Establishing a system to propagate 'Self Discipline' in following the guidelines laid in this document.

4. Employees Responsibilities:

All employees have a responsibility to:

- Be personally responsible and accountable for their own performance, behavior, attendance and punctuality in the workplace.
- Undertake their duties and behave in a manner that is consistent with the provisions of the Employee Code of Conduct,
- Report any departure from the Employee Code of Conduct by themselves or others,
- Comply with company's policies and procedures,
- Promote a positive, safe and healthy environment in the conduct of their work.

5. Attendance and Punctuality:

Office timings for all the employees of Committed Cargo Care Limited are:



Monday- Saturday: 0930 hrs to 1800 hrs.

Lunch Break: 1300 hrs. – 1330 hrs.

- ▯ Employees are expected to be punctual and regular in their attendance.
- ▯ No employee will be marked present on duty until he/she has marked his/her attendance in the daily attendance record of the company.
- ▯ When an employee is unavoidably absent from work due to sickness or any other reason, the employee should telephone their manager (or appropriate delegate) promptly (preferably before their normal starting time) and indicate their likely return to work.
- ▯ Managers may exercise their responsibility to contact employees who have not contacted them directly within a reasonable timeframe to ascertain the reasons for that individual's absence.
- ▯ Employees wishing to extend their leave must arrange this before commencing the leave. If the employee is on leave they must speak to their immediate manager at least 2 working days before their leave ends.

6. Dress & Appearance:

Committed Cargo Care Ltd. is well recognized and respected and projects a particular image to our clients. Employees must therefore ensure that their appearance is neat, clean and appropriate for their particular area of work. A high standard of personal hygiene is expected at all times.

Dress Code for Employees (Male):

- Formal Trousers, Formal Shirts, Black Leather Shoes. For customer facing group preferably Business formals.

Dress Code for Employees (Female):

- Modest shirts, Skirts (not above knee), Formal Trousers, formal jackets, Saari, Salwar Kameez with Dupatta.

Dress Code for Staff in Office on Weekends (Saturdays):

- Appropriate Casual Wear

Employees who are provided with uniforms are supposed to be dressed in uniforms only whenever they report on duty.

7. Personal Behavior:

Employees should perform the duties associated with their position to the best of their ability, diligently, impartially and conscientiously. In the performance of their duties, employees should:



- ▮ Comply with legislative and industrial obligations and administrative policies.
- ▮ Strive to keep up to date with advances and changes in the knowledge and the professional and ethical standards relevant to their areas and expertise.
- ▮ Maintain adequate documents to support decisions made.
- ▮ Treat all persons with courtesy and sensitivity to their rights and provide all necessary and appropriate assistance. Not make disparaging remarks about other employees.
- ▮ Not take or seek to take improper advantage of any official information gained in the employment with Committed Cargo Care Ltd.
- ▮ Not harass or discriminate against employees or in work practices on the grounds of sex, pregnancy, race (including colour, ethnic background or national identity), marital status, disability, sexual preference, political or religious belief, or age.
- ▮ Act responsibly when becoming aware of any unethical behaviour or wrong doing by any employee. Such information should be forwarded to the MD/CEO.
- ▮ Continuously improve work performance. All employees should actively pursue quality improvements.
- ▮ Employee should not get involved in any physical, verbal abuse or shouting with colleagues or external customers. Employees/Managers who become aware of serious breaches of policy must immediately notify their manager or the MD/CEO.

8. Fairness & Equity:

Each manager and employee shall endeavour to deal fairly with the Company's customers, suppliers, competitors, directors, officers and employees. None shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

If an employee is required to investigate complaints against other employees or issues affecting employees, they must act consistently, promptly, and fairly and in a timely manner. The principles of natural justice must be maintained in dealing with each investigation.

9. Transparency and Auditability:

All directors, senior management and employees shall ensure that their actions in the conduct of business are totally transparent except where the needs of business security dictate otherwise. Such transparency shall be brought about through appropriate policies, systems and processes, including as appropriate, segregation of duties, tiered approval mechanism and involvement of more than one manager in key decisions and maintaining supporting records. It shall be necessary to voluntarily ensure that areas of operation are open to audit and the conduct of activities is totally auditable.

10. Use of Facilities and Equipment:

All employees and managers shall protect the Company's assets and ensure their efficient use. Theft, loss, misuse, carelessness, and waste of assets have a direct impact on the Company's profitability. All Company assets shall be used for legitimate business purposes. The personal use of Company assets without permission is prohibited.



11. Confidentiality and use of official information:

Employees have an obligation to ensure that professional information is secured against loss, misuse or unauthorised access, modification or disclosure.

Employees have a duty to maintain the confidentiality, integrity and security of official information for which they are responsible. This information may include but is not limited to customer details, processes, system details, tariffs, commission, incentives, budgets, financial statements and records etc. The Confidential information includes all non-public information (including private, proprietary and other) that might be of use to competitors or harmful to the Company. The use of confidential information for his/her own advantage or profit is also prohibited.

While employees can contribute to public debate on social issues there are some circumstances in which public comment is inappropriate. Public comment by employees should not imply that the comment, although made in a private capacity, is in some way an official comment by Committed Cargo Care Ltd. The employee may only disclose official information, with due regard to confidentiality, in order that it is in their official capacity and duties.

An employee can disclose confidential or restricted information or documents acquired in the course of their employment only when required to do so by law, in the course of their duty, when called to give evidence in court, or when proper authority has been given. Approval to release confidential information on employees should be sought from the MD/CEO.

In circumstances where employees are requested to provide information, they should provide it in a timely and accurate manner and which complies with the principles of Freedom of Information, confidentiality, and the rights of the individual.

Employee's acting in honorary capacities may be asked by third parties to make comment on Committed Cargo Care Ltd. policy or procedure and in such cases; employees should confine comments to factual information. Where employees are privy to information of a restricted nature, which may compromise the position of the Committed Cargo Care Ltd. or infringe on the privacy of members of Committed Cargo Care Ltd., the information should not be divulged.

12. Records Management:

Employees need to be aware of their record keeping responsibilities and are reminded there is a legal requirement to adhere to proper records management practices and procedures. All employees must therefore ensure that documents are not placed in unofficial or private filing systems but place such documents in official files.

Employees must not remove documents from official files. They are controlled records, and must be complete, up-to-date and capable of providing organisational accountability when officially scrutinised.



Employees must not damage, dispose of, or in any other manner, interfere with official documents or files. The destruction of records may only take place in accordance with a disposal and retention schedule, which has been approved by the MD/CEO.

13. Conflict of Interest:

If an employee becomes aware of the potential for conflict of interest, then they must notify their manager of the potential or actual conflict of interest. Committed Cargo Care Ltd. expects employees to:

- ▯ Declare any likely conflict of interest to supervisors; and
- ▯ Avoid any detrimental outcome as a result of a conflict of interest.

If a conflict of interest arises where an employee is:

- ▯ Engages or is likely to engage in activities or advances, or
- ▯ Likely to advance personal or other interests at the expense of Committed Cargo Care Ltd. interests or the interests of other employees, Committed Cargo Care Ltd. may then intervene.

Employees must ensure that there is no conflict or incompatibility between their personal interests, whether pecuniary (e.g. money) or non-pecuniary and the impartial fulfilment of their duties. It is not possible to define all potential areas of conflict of interest but a number of situations are referred to below.

- ▯ Gifts and hospitality offered where there is an expectation of a return favour (which may or may not be to the detriment of the Committed Cargo Care Ltd.)
- ▯ Additional employment that prevents or hinders the performance of a person in their role
- ▯ Decisions regarding the employment or promotion of relatives or friends
- ▯ Promotion of or soliciting for clients for own private business

If an employee is in doubt as to whether a conflict exists, they must contact their manager. Wherever possible employees should disqualify themselves from situations of conflict of interest.

A conflict of interest may arise where an employee makes or participates in decisions affecting another person with whom they have a personal relationship (such as a relative, spouse, close friend or personal associate). In cases where a conflict may arise, employees must advise their manager. Wherever possible employees should disqualify themselves from dealing with those persons in such situations.

Where an employee has an impartiality, financial or proximity interest in any matter regarding provisions outlined within this Code, or which might be perceived as being in conflict with the interest of another person who may be affected then the employee must immediately disclose this to the MD/CEO or at the meeting if prior disclosure is not possible.



14. Financial Interests:

Employees should avoid any financial involvement or undertaking that could directly or indirectly compromise or undermine the performance of their duties or the Committed CargoCare Ltd. objectives or activities.

Financial conflict of interest may arise where an employee, who has a financial interest in a company or other business, is in a position to influence contracts or transactions between the Committed Cargo Care Ltd. and that business. This conflict may extend to any business undertaking in which employees and their immediate family or the employees is acting in direct competition with the Committed Cargo Care Ltd. activities or interests for personal gain.

15. Promotions, Transfer within company:

No employee shall elicit the improper influence or interest of any person to obtain promotion, transfer or other advantage. Promotions should be done only on the basis of an employee's performance and behavioral track record within Committed Cargo Care Ltd. In case an employee is willing to transfer from the existing location due to any reason, he/she should submit a request letter to Human Resource Department of the company regarding the same. The request may/may not get approved.

16. Employee/Client boundaries:

The term 'employee/client boundaries' identifies the importance of the trust inherent in the relationship between employees and their clients however, breaching of employee/client boundaries is going outside the limits of the employee/client relationship. Employees are expected to maintain proper boundaries with clients. Employees are expected to make themselves aware of any workplace and/or program-specific policies/guidelines in this area.

17. Statutory Compliance with lawful instructions — Law of Land

Employees must comply with any lawful instruction as prescribed by the Constitution of India. Alcohol and substance abuse or misuse - Employees must ensure that the safety and health of other employees, volunteers and clients are not endangered by any misuse. The Committed Cargo Care Ltd. expects employees to perform their jobs with skill, care and diligence. Employees should not perform any act or omission that is likely to have a detrimental effect on their work performance and that of other employees and clients. Accordingly, employees should not be under the influence of alcohol or other substances while they are at work or at work functions. Possession, use or trafficking in illegal drugs on the premises is not permitted. The Committed Cargo Care Ltd. premises include but are not limited to all buildings, vehicles, car parks, meeting rooms, and open spaces. Any such activity will be immediately referred to the police and the Committed Cargo Care Ltd. may take disciplinary action, which may include termination of employment.

Employees must notify the manager if the taking of, or failure to take, prescribed medication is likely to affect their performance and/or affect the safety of any person at the workplace.



This is to ensure workplace safety is not jeopardised and that any performance impact is properly managed. It is the responsibility of employees to follow the directions/precautions for any drugs prescribed by a health professional for individual use and/or commercially available preparations that may impact their capacity.

Smoking - Passive smoking can impact on other employees, the community and create a poor image of the Committed Cargo Care Ltd, which does not promote or encourage smoking. Smoking is not permitted in Committed Cargo Care Ltd. owned or leased vehicles or buildings.

Employees may only smoke in their own time during authorised breaks as set out in the award, agreement or employment contract and/or as authorised individually by their manager.

Racial and religious vilification - Racial and religious vilification is conduct that incites hatred against, serious contempt for, or revulsion or severe ridicule against a person or group on the grounds of racial identification or religious belief or activity. Racial and religious vilification is a form of harassment and discrimination and is unacceptable conduct in the Committed Cargo Care Ltd. All reported incidents will be investigated.

18. Policies:

Employees are responsible to carry out and comply with the Committed Cargo Care Ltd. policies and procedures and legislation. It is acknowledged that employee views, on particular matters, may differ from the Committed Cargo Care Ltd.; however such views must not either interfere with the performance of an employee's duty or prevent the employee from supporting the Committed Cargo Care Ltd. objectives. Company has all rights to take strict action against employee, violating any rule, regulation or employee policy applicable to him/her.

19. Harassment:

Harassment is any type of behaviour that:

- ▯ The other person does not want and does not return
- ▯ Offends, embarrasses, or scares them, and may be either sexual or non-sexual in nature
- ▯ Targets them because of their race, sex, pregnancy, or other protected attribute under the law
- ▯ Constitutes a form of bullying

Harassment does not have to be a series of incidents or an on-going pattern of behaviour. Neither does harassment need to be intentional to attract disciplinary action. Harassment can occur in any work related context including:

- ▯ Social functions
- ▯ Conferences
- ▯ Office social gatherings



▯ Business trips

Harassment and discrimination form part of a continuum of unacceptable behaviour that can include sexual assault, stalking and harassing phone calls, some of which are also against criminal law, which means the police may prosecute anyone who commits such acts. Fair discipline, performance counselling or workplace control practices based only on performance issues do not, in themselves, constitute harassment.

20. External Employment:

Committed Cargo Care Ltd. will not restrain employees from working outside business hours provided that the employees do not undermine or compromise the Committed Cargo Care Ltd. Employees should not engage in such employment, if that employment:

- ▯ Places them in conflict with their official duties, or would lead to the perception that they have placed themselves in conflict with their duties;
- ▯ Is likely to affect their efficiency in the performance of their duties; or
- ▯ Involves the use of Committed Cargo Care Ltd. resources for private purpose without authorisation or recompense.

Subject to current policies, employees may not accept outside payment for activities, which would be regarded as part of their normal work activities. If the employee wishes to take external employment fulfilling the above condition the same has to be requested by the employee in writing, recommended by HR and approved by the MD/CEO.

21. Ownership of Products and Copyright:

All products, literary, dramatic, musical, cinematographic and artistic works, computer programs, material in written or other format, discoveries, inventions and improvements in relation to such matters, together with all copyright and intellectual property created, authored, discovered, developed or produced by the employee for the purpose of, or in the course of, the employee's employment will remain the property of the Committed Cargo Care Ltd. and will not be used by the employee other than for the purpose of sheer business. Unless otherwise agreed, the Committed Cargo Care Ltd. retains the copyright of work produced by you during your employment with the Committed Cargo Care Ltd.

Upon termination of employment the employee will return all correspondence, documents, data, information, equipment and things, including copies thereof, belonging to the Committed Cargo Care Ltd that may be in the employee's possession, custody or control. Protection and Proper Use of Company Assets

All employees, officers and directors shall protect the Company's assets and ensure their efficient use. Theft, loss, misuse, carelessness, and waste of assets have a direct impact on the Company's profitability. All Company assets shall be used for legitimate business purposes. The personal use of Company assets without permission is prohibited.



22. Grievance Handling:

It is expected that as a first step, employees will attempt to resolve the issues between themselves. Where this is not appropriate or does not result in a satisfactory resolution a more formal procedure as outlined in the Grievance — Resolving Issues and Concerns Policy can be applied.

The dispute resolution process will operate within the following principles: Confidentiality, Impartiality, Promptness, Sensitivity, Courtesy and Respect.

Disputes may be resolved in a formal or informal manner. Where possible, as a first step and with the agreement of both parties, the dispute may be resolved informally. If the dispute is not resolved at the informal level then the formal process provides graduated steps for further discussion and resolution at high levels of authority. A formal resolution requires a thorough investigation to be undertaken, and the process documented.

Appropriate managers will investigate a complaint or allegation of behavior that is contrary to these standards. Investigations will be carried out with sensitivity and fairness and maintain confidentiality.

23. Information Technology policy:

Committed Cargo Care Ltd. provides employees with a host of Electronic Technologies and Services, including Computers, E-Mail, Printing and Internet services. These technologies and services are intended to be used for business purposes only and are meant to assist employees in completing job responsibilities as effectively as possible.

Email - Staff may only use e-mail and web browsing for work related purposes and that all e-mail and web access logs will be monitored for compliance with the staff position. As the organisation has responsibility for its computer systems and networks, it has the right to make directions as to its use.

Informing people about the personal information that is collected held and what is done with it is an important privacy principle.

Computer Network use limitations and Prohibited activities: Without prior written permission from Committed Cargo Care Ltd, the computer network may not be used to disseminate, view or store commercial or personal advertisements, solicitations, promotions, destructive code (e.g., viruses, Trojan horse programs, etc.) or any other unauthorized materials. Occasional limited appropriate personal use of the computer is permitted if such use does not a) interfere with the user's or any other employee's job performance; b) have an undue effect on the computer or company network's performance; c) or violate any other policies, provisions, guidelines or standards of this agreement or any other of the Committed Cargo Care Ltd. Further, at all times users are responsible for the professional, ethical and lawful use of the computer system. Personal use of the computer is a privilege that may be revoked at any time.



Desk Top / Laptop Use:- Any malfunctioning of the computer system due to power, booting and / or operating system failure, username / password failure, hard disk problem, keyboard, monitor, LCD display and mouse not functioning should be reported to System Administrator before taking any service from outside parties for repairs. Laptops should be handled with utmost care for not getting damage for the LCD screen and other internal peripherals. Any allocation of Desktop / Laptop should be routed through Head of Department to Department of HR & IT.

Virus detection: - Files obtained from sources outside the Company, including disks brought from home, files downloaded from the Internet, newsgroups, bulletin boards, or other online services; files attached to e-mail, and files provided by customers or vendors may contain dangerous computer viruses that may damage the Company's computer network. Users should never download files from the Internet, accept e-mail attachments from outsiders, or use disks from non-Company sources, without first scanning the material with approved virus checking software. If you suspect that a virus has been introduced into the network, notify the System Administrator immediately.

Frivolous Use: - Computer resources are not unlimited. Network bandwidth and storage capacity have finite limits, and all Users connected to the network have a responsibility to conserve these resources. As such, the User must not deliberately perform acts that waste computer resources or unfairly monopolize resources to the exclusion of others. These acts include, but are not limited to, sending mass mailings or chain letters, spending excessive amounts of time on the Internet, playing games, participating in online chat groups, uploading or downloading large files, accessing streaming audio and/or video files, or otherwise creating unnecessary loads on network traffic associated with non-business-related uses of the Internet.

24. Acceptance of commissions, gifts or benefits:

Employees should not accept a gift, secret commission or a benefit from a person or organization outside the Committed Cargo Care Ltd. if the intent of the gift or the benefit is to induce the employee to waive or reduce requirements or to extend a financial or other benefit to a person or organization outside the Committed Cargo Care Ltd. to the detriment of the Committed Cargo Care Ltd. interests.

As a general rule, no employee should accept a gift or benefit if it could be seen as intended or likely to cause that person to:

- ▯ Perform their job in a particular way, which the person would not normally do, or
- ▯ Deviate from the proper or usual course of duty.

Employees may accept token gifts or benefits in circumstances approved by the MD/CEO or a nominee, provided that there is no possibility that the employee might be perceived to be, compromised in the process. Gifts of a nominal value generally used for promotional purposes by the donor, or moderate acts of hospitality may be accepted by employees.



The employee must advise their manager of any gifts and benefits they have received as soon as the gift or benefit is received and must not take advantage or seek to take advantage of their position to obtain a benefit, either for themselves or for someone else.

25. Breaches of Code:

Committed Cargo Care Ltd. is committed to the standards set out in the Employee Code of Conduct. Where a breach of the Code has been identified by the Committed Cargo Care Ltd. a response to the breach may result in:

- ▯ Counselling,
- ▯ Disciplinary action,
- ▯ Termination of employment,
- ▯ Suspension; or
- ▯ Laying of criminal charges or civil.

26. Terminology:

- ▯ Employees refers to general employee.
- ▯ Personal information means any information about an identified or identifiable individual that is not available in the public domain.
- ▯ Records management is the control and management of records to meet business, legal, fiscal and administrative requirements. It is a business imperative, a corporate responsibility and a critical function performed through the collective actions of individuals.
- ▯ A record is recorded information in any form, including data in computer systems, created or received by any employees of the (insert name of organisation) in the course of his/her duties.
- ▯ Conflicts of interest are assessed in terms of the likelihood that employees possessing a particular interest could be influenced, or might appear to be influenced, in the performance of their duties.
- ▯ Public comment includes public speaking engagements, comments on radio and television; and expressing views in letters to the newspapers or in books, journals or notices, or where it might be expected that the publication or circulation of the comment will spread to the community at large; and
- ▯ Senior Officer means the MD/CEO; General Managers, Branch heads, head of departments, Compliance Officer.



Supervisor Code of Conduct

Statement

By signing this statement, I declare that, I acknowledge that I have communicated / trained / explained Mr. / Ms. _____ to abide by the Committed Cargo Care Limited's Employee Code of Conduct & Business Ethics Policy.

(Signature)

(Print name)

(Insert date)

The original signed statement should be placed in the employer's personal file and a copy should be provided to the employee.



Employee Code of Conduct
Statement

By signing this statement, I declare that, I acknowledge that I have communicated / trained / explained Mr. / Ms. _____ to abide by the Committed Cargo Care Limited's Employee Code of Conduct & Business Ethics Policy.

(Signature)

(Print name)

(Insert date)

The original signed statement should be placed in the employer's personal file and a copy should be provided to the employee.