

Date: November 01, 2021

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## **Code of Conduct for Team Members**

### **Introduction:**

It is vital to the success of Venture Center that we conduct our business with honesty and integrity and in compliance with all applicable statutory requirements. This Code of Conduct sets out the fundamental standards to be followed by all our team members in their everyday actions on behalf of the organization.

### **Code of Conduct:**

#### **a) Standard of Conduct:**

Venture Center's commitment to dealing honestly and fairly with all our stakeholders, including our clients, customers and team members is founded upon our core ethical principles of trust, respect for people and transparency. This means we will honor our contractual commitments and uphold both the letter and spirit of our organizational arrangements. This also means that we will treat our team members fairly and we will fully comply with all applicable laws prohibiting discrimination against our team members and customers.

#### **b) Obeying the law:**

Team members are required to work in accordance with the organisational policies, and applicable laws, governmental rules and regulations. Venture Center has a zero tolerance policy for violation of governing rules, regulations, and laws. Team members will be expected to abide by ethical principles by following closely, business behaviors and practices.

#### **c) Team members:**

Venture Center is committed to providing an equal opportunity for employment with no discrimination on the grounds of race, caste, religion, color, marital status, gender, nationality, age, ethnicity, sexual orientation, or disability.

There will be no acceptance of team members being subjected to offensive, abusive or other unwanted behaviour at the workplace which violates the personal dignity of the victim or creates an intimidating, hostile or humiliating environment for the victim (e.g. physical, sexual, psychological, verbal or any other form of harassment). It is Venture Center's policy to ensure that the behaviour of its team members does not discriminate against anyone on the grounds of gender, age, ethnicity, national origin, religion, disability, sexual orientation, citizenship, their abilities or any other relevant characteristic protected under the applicable law.

**d) Conflicts of interest:**

Venture Center makes all organization decisions objectively, not based on any individual employee's personal benefit or advantage. This means that team members must recognize when a conflict may exist and always act in the best interests of the organization. Integrity dictates that all team members avoid doing anything that presents an actual or a potential conflict of interest.

Venture Center and its team members shall at no cost participate in activities which compromises the interest of the organization to personal gain and interest. The organization's interest shall be second to none. No employee will seek full time or part time job or be involved in any way with competitor's business activities either directly or indirectly during your employment with the organization.

**e) Confidentiality:**

All team members must maintain integrity in their internal and external communication and high confidentiality of information entrusted to them. Disclosure of any such information shall only ensue if authorized or mandated. No employee will at any time disclose or use, either during or subsequent employment, any sensitive information, knowledge, data which is received or developed during his/her employment which is considered proprietary by Venture Center. This includes information relating to products, processes, technical presentations, know-how, customers, designs, drawing, formulas, test data, marketing data, accounting, pricing, salary information, business plans, strategies, and contracts.

**f) Data:**

Venture Center is committed to the responsible, ethical and fair use of data. We collect and use data in line with our values, applicable laws and with respect for privacy as a human right.

**g) Public activities:**

Venture Center will co-operate with governments and other organizations, both directly and through bodies such as trade associations, in the development of proposed legislation and other regulations which may affect legitimate business interests. Venture Center neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests.

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**h) Gifts, bribery and corruption:**

Venture Center does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. Venture Center and its team members are not permitted to accept, make, or offer any gifts, payments, remunerations and donations as a business favour.

Venture Center will not tolerate unfair practices to compete and win business. All our organization decisions are made objectively, and we expect that our clients and suppliers will do the same.

**i) Professionalism:**

Venture Center team members work professionally and in good faith to advance the organization interests. They are responsible for ensuring that the organization's assets are not misused or wasted, including proprietary information and other intangible property.

**j) Protection of assets:**

Venture Center holds exclusive rights to all the intellectual property created by and for the business. Team members shall respect and work towards protecting the moral and economic rights of the creator. All team members should protect the assets of Venture Center and ensure their efficient use. Organization assets shall only be used for legitimate business purposes.

**k) Accuracy of Company records**

Venture Center strives to earn the trust and confidence of its stakeholders, and is committed to providing them with accurate, transparent, and timely information. The integrity of our records is essential to these goals, and ensures that the organization can base its organization decisions on full, accurate and reliable information. Venture Center and its team members are required to keep accurate and proper books and accounting and other records which give a true and fair view of the financial position, results of operations, transactions, assets, and liabilities of the organization. These documents must be maintained in accordance with applicable generally accepted accounting principles and internal controls and accounting procedures. Team members have a duty not to make false or artificial entries in books and records for any reason at any time. The organization's assets may only be used in accordance with management authorization.

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## I) Non-disparagement

Venture Center team members will not disparage or encourage others to disparage the company. For purposes of this code of conduct, the term disparage includes without limitation comments or statements made in any matter or medium in the press and/or the media about the company which would adversely affect any manner of the conduct of the business of the company, without limitations to the company's plans or prospects or the reputation of the company.

### Who must follow the code?

All team members, including full –time employees, part-time employees, contract employees and consultants are responsible for understanding and complying with this Statement and with all other applicable policies. Failure to abide by this Statement or other policies may result in disciplinary action up to and including termination of employment in accordance with local laws.

In accordance with local laws and regulations, team members are also responsible for reporting promptly any violations of law or VC policies of which they become aware, and for raising issues or concerns as soon as issues or questions arise. All reports should be made in good faith and be properly documented. Reports of suspected violations will be fully treated seriously and confidentially.

Team members making such reports will not be subject to retaliation, threats or harassment, and their identity will be held in confidence to the extent permitted by law

### Conclusion

It's impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another's good judgment to uphold a high standard of integrity for ourselves and our company. We expect all our team members to be guided by both the letter and the spirit of this Code.

In case of any questions or concerns related to the Code of Conduct, please write to [hr@venturecenter.co.in](mailto:hr@venturecenter.co.in).

I have read Venture Center's CODE of CONDUCT and agree to comply with it \_\_\_\_\_  
(Signature of the employee)

Name of team member:

Employee code (if applicable):

Date: