



VERSION 2.0

THIRD PARTY CODE OF CONDUCT

Servify is the registered trademark of **Service Lee Technologies Private Limited**

DOCUMENT CONTROL SHEET

Document History

| Version No. | Release Date | Policy / Description of Change | Prepared /Revised by | Reviewed By | Approved By |
|--------------------|---------------------|---------------------------------------|-----------------------------|---------------------------|---------------------------|
| 1.0 | 01/04/2021 | Third Party Code of Conduct | Head- Legal and Secretarial | Head- Corporate Functions | Head- Corporate Functions |
| 2.0 | 01/04/2022 | Third Party Code of Conduct | Head- Legal and Secretarial | Head- Corporate Functions | Head- Corporate Functions |

THIRD PARTY CODE OF CONDUCT

Servify Group takes enormous pride in its reputation for integrity, which is vital to its success. The strength of Servify Group's reputation is based not only on their own conduct but also on the actions of those with whom it does business. For this reason, Servify Group aspires to work with Stakeholders who share the same values and reflect the same high ethical standards. The Company has, therefore, adopted the Third Party Code of Conduct ("**Code**") which sets out the basic requirements that it expects from the Stakeholders to respect and adhere to when conducting business with Servify Group. The Stakeholders must take all reasonable steps to ensure that this Code is communicated throughout their organizations and made available to their employees, consultants, contractors and subcontractors who work with Servify Group.

The Code supplements the Servify Policies and should be read in conjunction with: (i) the Servify Policies; (ii) any guidance published pursuant to the Code; and (iii) any other relevant policies as may be implemented by Servify Group from time to time.

DEFINITIONS

- (i) "**ACAB**" means the Anti-Corruption and Anti-Bribery adopted by Servify Group;
- (ii) "**Code**" means this Third Party Code of Conduct adopted by Servify Group;
- (iii) "**Chief Financial Officer**" means the Chief Financial Officer appointed by the Company;
- (iv) "**Chief Operating Officer**" means the Chief Operating Officer appointed by the Company;
- (v) "**Code of Conduct**" means the Code of Conduct adopted by Servify Group;
- (vi) "**Company**" means Service Lee Technologies Private Limited;
- (vii) "**Compliance Officer**" means an employee of sufficient seniority, competence and independence designated by the Company as such to ensure compliance with the provisions of this Code, and the Head - Legal and Secretarial is currently designated as the Compliance Officer;
- (viii) "**Directors**" means every director, both former and current, of Servify Group;
- (ix) "**Employees**" means every employee ,both former and current, whether full time or part time, of Servify Group (whether working in India or abroad);
- (x) "**Executive Leadership**" means the Founder/ Chief Executive Officer, the Chief Financial Officer, the Chief Operating Officer, the Head- Strategy, and the Head-Corporate Functions;
- (xi) "**Founder/Chief Executive Officer**" means Mr. Sreevathsa Prabhakar;
- (xii) "**Head-Corporate Functions**" means the Head-Corporate Functions appointed by the Company;
- (xiii) "**Head- Strategy**" means the Head- Strategy appointed by the Company;
- (xiv) "**Servify Group**" means, collectively, the Company and the Subsidiaries;

- (xv) “**Servify Policies**” means all the policies adopted by Servify Group for its Stakeholders from time to time, including but not limited to, this Code, the Code of Conduct, the ACAB Policy, the Whistleblower Policy, and all other policies as adopted by Servify Group from time to time;
- (xvi) “**Stakeholders**” means and includes suppliers, service providers, sales representatives, channel partners (including dealers), distributors and agents, lenders, customers, business associates, trainee and others with an interest or concern in the business of the Company and/or the Subsidiaries, or with whom the Company and/or the Subsidiaries has any business, financial or commercial dealings, and the term “**Stakeholder**” will be construed accordingly;
- (xvii) “**Subsidiaries**” will have the meaning ascribed to it under the (Indian) Companies Act, 2013, and includes ServiceLee Techsystem Solutions Private Limited, ServiceMart Technologies Private Limited, Servify (US), Inc., Servify (Canada) Inc., Servify (Europe), B.V., Servify Technology (Shenzhen) Co., Ltd., Servify UK Limited, Servify Middle East FZE, Servify Australia Pty. Ltd., Servify Turkey Technology Services Trade Limited (Servify Teknoloji Servicleri Tic Ltd Sti), Servify Hongkong Ltd., Servify (Singapore) Pte. Ltd. Servify Technology Solutions LLC, Service Lee Sigorta ve Reasürans Brokerliği Limited Şirketi and Saudi Arabia for Telecom & IT, and includes any other subsidiary as may be established by the Company from time to time; and
- (xviii) “**Whistleblower Policy**” means the Whistleblower Policy adopted by Servify Group

GENERAL STANDARDS

Servify Group expects its Stakeholders to share Servify Group’s commitment to comply with the following standards to the extent they are applicable to business relationship with Servify Group:

1. COMPLIANCE WITH LAW

The Stakeholder is required to comply with all the applicable laws, rules, regulations and treaties, including but not limited to laws related to anti-corruption and anti-bribery, competition, business conduct, product quality and ingredients, environmental standards, occupational health and safety, privacy and data protection, labour and employment, and any other laws described herein or that are otherwise applicable to the products and/or services it provides to Servify Group in all locations in which its conduct business operations.

2. LABOUR LAW AND HUMAN RIGHTS

Servify Group is committed to upholding the human rights of workers and treating them with dignity and respect. This applies to all employees and workers, including temporary, migrant, student, contract, direct employee, and any other type of employee or worker. Servify seeks to work with Stakeholders who:

- (i) comply with all applicable local, state and national laws regarding human rights;
- (ii) ensure that all their employees are hired on their own free will and guarantee that all their operations are free from forced, bonded, compulsory, indentured, prison labour or any other form of compulsory labour and child labour;
- (iii) ensure that all its employees are provided equal employment opportunities, an environment conducive to their growth, free from any form of discrimination and harassment;
- (iv) ensure compliance with minimum working hours and minimum wages prescribed by applicable laws and regulations;
- (v) comply with all slavery and human trafficking laws and have ensured that they have taken steps to ensure their business operations are free from slavery and human

trafficking practices both internally and within their supply chains and other external business relationships.

- (vi) ensure that employees are not be charged any fees or costs for recruitment, directly or indirectly;
- (vii) provides a safe and healthy workplace that promotes wellbeing and protects the environment;
- (viii) provides equal opportunity to employees at all levels regardless of color, race, gender, gender identity, age, ethnicity, national origin, sexual orientation, marital status, religion, veteran status, disability or any other characteristic protected by applicable law; and
- (ix) not confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation of any of its workers/ employees.

3. **CONFLICT OF INTEREST**

The Stakeholder will not enter into any financial or other relationship with an Employee, Director, consultant or contractor of Servify Group that creates any actual or potential conflict of interest for Servify Group. The Stakeholder is also expected to report to the Company and/or the concerned Subsidiary, as the case may be regarding any situation where an Employee, Director, consultant or contractor of Servify Group with the Company and/or the concerned Subsidiary, as the case may be, may have an interest of any kind in the Stakeholder's business or any kind of economic ties with the Stakeholder.

4. **ANTI-CORRUPTION ANTI-BRIBERY**

Servify Group expects its Stakeholders to conduct business transparently, honestly and fairly. Servify Group requires its Stakeholders to comply with the ACAB Policy as well as with all applicable anti-corruption and anti-bribery laws, including but not limited, to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, 2010. Any Stakeholder may also forthwith report any anti-corruption and anti-bribery matter as per the ACAB Policy or the Whistleblower Policy.

5. **ANTI-MONEY LAUNDERING**

Servify Group expects its Stakeholders to look for any signs of money laundering when conducting business with their own third parties. The Stakeholders are expected to be alert to red flags such as business partners who refuse to provide information about their identities or common transaction details, or who make unexplained changes to transactions. When red flags are noticed, Stakeholders must take appropriate action to avoid money laundering activity.

6. **HEALTH, SAFETY AND ENVIRONMENT**

The Stakeholder must: (i) provide a safe and healthy working environment to all its employees, and comply with all applicable laws and regulations regarding working conditions; (ii) follow all environmental, health and safety and other operational policies as per requirements of applicable laws, particularly regarding the emission of greenhouse gases, consumption of water and energy, and the management of waste and hazardous materials; and (iii) follow all applicable laws, including laws on environment sustainability and protection while executing any work for Servify Group.

7. **DATA PRIVACY**

The Stakeholder must: (i) respect the privacy of the employees, consumers, customers, suppliers and other stakeholders of Servify Group; (ii) take all reasonable and appropriate steps

to safeguard personal information provided pursuant to the business relationship with Servify; (iii) collect, process, use, store and retain personal information obtained from Servify Group, or about the employees, consumers, customers, suppliers, and other stakeholders of Servify Group, only as necessary and in compliance with all applicable data privacy and data protection laws, and in the event that a Stakeholder collects, processes, uses, stores or retains personal information at request of, or on behalf of Servify Group, such Stakeholder will be required to agree to certain contractual obligations with Servify Group to ensure that it complies with Servify Group's standards regarding the protection of such personal information.

8. INTELLECTUAL PROPERTY

The Stakeholder must take appropriate steps to safeguard and not infringe any of the confidential and proprietary information/intellectual property/ technology of Servify Group which come to its knowledge during the course of its business relationship/ dealings with Servify Group. In case of sub-contracting, such confidential information may be shared by the Stakeholder only with the prior written consent of Servify Group.

9. THIRD PARTY REPRESENTATION

The Stakeholder will not be authorised to represent the Company's brand without the permission of the Company. The Stakeholder is expected to abide by the Code in their interaction with, and on behalf of Servify Group, including the confidentiality of information shared with them.

10. ENVIRONMENTAL STANDARDS

Servify Group places a high value on the protection of environment and is committed to doing their part to help preserve the Earth's finite resources. The Stakeholders are expected to comply strictly with the letter and spirit of all applicable environmental laws and regulations.

11. QUALITY STANDARDS

The Stakeholders must produce, package, store, ship or otherwise handle product in accordance with the good manufacturing, distribution and professional service practices prevailing in their respective industries.

12. RESPONSIBILITIES OF STAKEHOLDERS

It is sole responsibility of the Stakeholders to abide by the Code and to restrict their actions/conduct within the set framework of the Policy. The Stakeholders must ensure that they have read and understood this Code and must comply with the terms and conditions of this Code. Accordingly, the Stakeholder must: (i) read and understand the contents of this Code as a condition of doing business with Servify Group, and uphold such values during its business association with Servify Group; (ii) maintain adequate documentation to demonstrate compliance with the principles of this Code and allow access to the Company to check compliance upon request with reasonable notice; and (iii) notify the Company regarding any known or suspected improper behaviour by the Stakeholder relating to its dealings with Servify Group, or any known or suspected improper behaviour by the Employees or Directors or other Stakeholders of Servify Group. Any failure to adhere to this Code or any applicable law is grounds for termination or suspension of business relationship.

13. IMPLEMENTATION, REVIEW AND MONITORING

The Executive Leadership along with the Compliance Officer will oversee the implementation and monitoring of the Code regularly.

The Code will be reviewed by the Executive Leadership along with the Compliance Officer annually or as may be required by applicable laws.

14. DISSEMINATION OF POLICY AND TRAINING

This Code will be made available on the website and intranet of the Servify Group. Servify Group will provide training to the Stakeholders as per applicable laws.

15. DOCUMENT RETENTION

All documents related to queries, reporting, investigation and enforcement pursuant to this Code will be kept in accordance with applicable law and Servify Policies.

16. ADOPTION AND AMENDMENTS

This Code has been approved by the Board of Directors and adopted by Servify Group with effect from April 1, 2021.

This Code may be modified, amended or repealed at any time by the Company and will be adopted and implemented by the Servify Group accordingly.

Please contact the concerned Compliance Officer at complianceofficer@servify.tech if you have any queries about this Code.
