

# CODE OF ETHICS









#### Dear Clients,

Colenco Consulting Ltd has technical responsibility, but also commitment towards sustainable development, which is based on economic, social and environmental responsibility.

At Colenco, we believe innovations and collaborations will lead the way towards a more sustainable future and therefore, we have maintained our company tag line as "**Innovation for sustainable future**". With our unique expertise, and by having sustainability at the core of our offering, the Colenco family wants to contribute to solving the key issues and challenges on behalf of our stakeholders.

We gain the trust and credibility of our stakeholders by treating them with respect and ensuring that assignments are carried out in a timely and responsible manner in every part of the world.

The Code of Ethics will guide you in doing the right thing in every business situation. If you any can't find the answer in this Code, contact me for guidance and support. Our legal team is also available to support you as well. Please do not hesitate to speak up, if you suspect or notice unethical conduct or something that violates our Code of Ethics.

In this respect, our staff must be fully committed to enforce the following Code of Ethics, applicable in all areas of operations and across all countries.

Sandeep Bhowmick Managing Director









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#### Legal compliance

We comply with all applicable laws and regulations in the countries wherever we operate.

#### Fraud, bribery and corruption

Any form of bribe is strictly prohibited. As an employee or entrusted business partner, you are expected to act in accordance with our policies and guidelines when it comes to accepting or offering any form of gift or hospitality. Involvement in extortion, fraudulent practices, bribery or corruption will lead to disciplinary action and may lead to the termination of employment or contract, as well as criminal charges.

#### Safe and Healthy working environment

We are committed to provide a safe and healthy working environment and comply with all local applicable safety and health standard and regulations.

#### **Environmental Responsibility**

We have the responsibility to consider the environmental consequences in decision making and take preventative actions to mitigate the environmental impact.

#### **Providing Equal Opportunity**

The company will not discriminate against any individual based on race, colour, sex, national origin, age, religion, marital status, sexual orientation, disability or any factors prohibited by applicable laws. We have zero tolerance towards discrimination, harassment and other human rights violations.

## **Avoiding Conflicts of Interest**

The employees have the right to engage in business, financial and other activities outside their work at the company. In case of possible conflicts of interest with their professional activities, these activities need to be approved prior by the management. You must never let conflicting interests influence your behaviour at the expense of a party that has put legitimate trust in you and the company.

### **Communication and Employee Training**

The company makes its standards and policies publicly available. It is the duty of the employee hiring an employee or a supplier, consultant, sub-consultant, agent, intermediary or other similar person or entity, or entering into a consortium or joint venture arrangement, to duly inform such person or entity of the Code and its implications.

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### **Information Security**

The employees will not disclose any confidential data which is related to the company's human resource, marketing, financial and strategic plans in any form.

#### **Insider Trading**

Employees may receive information about other companies during their course of their work, which is not public. The use or disclosure of non-public information by employees for their own financial benefit or that of their relations is against the company policy and a breach of the law.

#### **Breaches of Code of Ethics**

All regulations of this Code of Ethics are binding for all employees, regardless of their hierarchy. Breaches of the Code of Ethics are fundamental violations of the company and have consequences. Breach or possible breach of the Code of Ethics must be reported to the Managing Director of the company. All reports are treated confidentially.

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