



*Privileged and Confidential  
March 17, 2021*

**ELCITA CODE OF CONDUCT  
FOR COMMITTEE MEMBERS AND STAFF MEMBERS**

*Effective Date: 17 March 2021*

## 1. INTRODUCTION

This Code of Conduct (“**Code**”) aims to apprise all Committee Members and Staff members of the standards that they must strive towards at all times during their tenure with Electronics City Industrial Township Authority (“**ELCITA**”). As a Committee Member or Staff member, you acknowledge and accept the scope and extent of the duties reposed in you by way of your appointment. You are also expected to carry out your duties in an honest and professional manner within the scope of your authority set forth under the laws of India. All Committee Members and Staff members are expected to act honestly, fairly, ethically, and with integrity *at all times*. You are expected to maintain a current knowledge of, as well as compliance with the policies in this Code. The guidelines established herein should help guide your behavior and decisions while carrying out your duties as a Committee Member or Staff member of ELCITA. For the avoidance of any doubt, the term ‘Staff members’ includes all part time, full time, casual, or fixed term employees.

You must always demonstrate the highest standards of conduct in keeping with this Code of Conduct. ELCITA reserves the right to revise, modify, delete, or add to any and all policies, procedures, work rules, or benefits stated in this Code.

As you read through the Code of Conduct, you may have questions. In such instances, please feel free to reach out to the *Committee Member in charge of Compliance and Governance* regarding any questions or concerns.

## 2. EQUAL OPPORTUNITY EMPLOYER

ELCITA is an equal opportunity employer and makes employment decisions on the basis of merit. This Policy prohibits unlawful discrimination based on race, colour, creed, gender, religion, marital status, age, national origin or ancestry, physical or mental disability, medical condition including genetic characteristics, sexual orientation, or any other consideration made unlawful by Central, state, or local laws.

ELCITA is committed to compliance with all applicable laws providing equal employment opportunities. To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, ELCITA will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or Committee Member or Staff member unless undue hardship would result.

If you require an accommodation in order to perform the essential functions of the job, please contact the Chief Security Officer (CSO) and request such an accommodation. ELCITA will identify possible accommodations, if any, that will help eliminate the limitation. If the accommodation is reasonable and will not impose an undue hardship, ELCITA will make the accommodation.

If you believe you have been subjected to any form of unlawful discrimination, submit a written complaint to your reporting Manager or, in the case of Committee Members your complaint can be submitted to the Chairperson. Your complaint should be specific and should include the names of the individuals involved and the names of any witnesses. ELCITA will immediately undertake an effective, thorough, and objective investigation and attempt to resolve the situation.

If ELCITA determines that unlawful discrimination has occurred, effective remedial action will be taken commensurate with the severity of the offense. Appropriate action also will be taken to deter any future discrimination. ELCITA will not retaliate against you for filing a complaint and will also take steps to ensure that other Committee Members or Staff members do not retaliate against you either.

### **3. HARASSMENT**

ELCITA strives to maintain a healthy work environment that is free of harassment, and where all Committee Members and Staff members are able to effectively perform their work without interference of any type. ELCITA will not tolerate any form of harassment based on pregnancy, childbirth or related medical conditions, race, religious creed, colour, national origin or ancestry, physical or mental disability, medical condition, marital status, age, gender, sexual orientation, or on any other basis protected by applicable laws or ordinance or regulation. All such harassment is unlawful. This anti-harassment policy applies to all persons affiliated with ELCITA and prohibits harassment of any nature by any Staff or Committee Member towards other Staff or Committee Members, outside vendors, visitors in the workplace and in any other work-related settings.

Harassment is any unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of any of those aforementioned factors when:

- a. Submission to such conduct is an explicit or implicit term of continuing to be associated with ELCITA; or
- b. Decisions based on an individual's continued association with ELCITA are based on that individual's submission to or rejection of such conduct; or,
- c. Such conduct unreasonably interferes with an individual's work performance or discharge of duties and creates an intimidating, hostile or offensive working environment.

Harassment includes, but is not limited to, the following behavior:

- a. Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted advances, invitations, or comments;
- b. Visual displays such as derogatory posters, photography, cartoons, drawings, or gestures;
- c. Physical conduct including assault, unwanted touching, intentionally blocking normal movement or interfering with work because of sex, race, or any other protected basis; and
- d. Retaliation for reporting or threatening to report harassment.

Ignoring harassment does not make it go away but may make it worse because the harasser may misinterpret no response as an approval of the behavior. Therefore:

- a. All suspected harassment incidents should be reported to your reporting Manager or the Chief Executive Officer (CEO) within 2 (two) days of occurrence whenever possible, and all information should be kept confidential throughout the course of any investigation.
- b. The investigation (wherever required) will be conducted generally within 10-15 days from reporting. Both parties and the witnesses will be interviewed separately, and interview records will be kept.

ELCITA specifically wishes to underscore its commitment to the objectives and spirit of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. For this purpose, ELCITA has formulated a separate anti-sexual harassment policy which can be referred.

If you have any questions relating to what constitutes discrimination or harassment, or if you have any other questions or concerns pertaining to discrimination or harassment, please do not hesitate to contact the Internal Committee for Prevention of Sexual Harassment.

#### **4. CONFLICTS OF INTEREST**

You are, during the entirety of your affiliation with ELCITA, required to promote the interests and further the business of ELCITA. You should not do anything which may be prejudicial or detrimental to ELCITA's aims and objectives. You must always act in the best interests of and fulfill your fiduciary obligations to ELCITA. Even the appearance of impropriety is not tolerated, hence you must endeavor to avoid situations where there could be even a *potential* conflict of interest. If you are ever in doubt of whether a particular situation involved an actual or potential conflict of interest, please do not hesitate to reach out to:

- (a) In the case of a Staff member, the Manager or the CEO.
- (b) In the case of a Committee Member, the Chairperson of the Committee or the CEO.

If an actual or potential conflict exists, then ELCITA will take whatever corrective action is necessary, given the circumstances.

Committee Members must be especially careful to conduct themselves in professional, courteous and respectful manner and not take improper advantage of their position. Specifically, Committee Members are expected to deal fairly with all stakeholders and not use their position or ELCITA's property for personal gain. Committee Members are expected to disclose any personal interest that they may have regarding any matters that may come before the committee. In such scenarios, the conflicted Committee Member must abstain from discussion, voting, or otherwise influencing a decision or any matter in which they have any direct or indirect interest.

#### **5. DISCIPLINARY PROCEDURE**

ELCITA, in its sole discretion, reserves the right to discipline Staff or Committee Members, in a manner that it deems appropriate given the specific circumstances. Disciplinary actions may range from informal warnings to immediate dismissal of the Staff member or removal of the Committee Member.

You are expected to perform your duties to the level required by ELCITA in accordance with acceptable standards of conduct. If you fail to comply with such standards, disciplinary action will be taken. For more information on the process to be followed during disciplinary proceedings please refer to our Disciplinary Policy.

There may also be situations where ELCITA would be required to deal with the misbehavior externally. For example, if the misbehavior discloses any conduct which may be criminal in nature or involves potential corruption or misfeasance, ELCITA may be under a statutory obligation to report the matter to the police or other external authorities. Nothing in this policy shall limit ELCITA from complying with its statutory or contractual obligations.



## **6. STANDARDS OF CONDUCT**

### **a. Smoking, Drug, and Alcohol Abuse**

ELCITA is concerned about the use of cigarettes, alcohol, illegal drugs, and controlled substances as it affects the workplace and functioning of ELCITA. It is therefore ELCITA's policy to maintain a smoke, drug and alcohol-free environment that is safe and productive for everyone.

Smoking is not allowed in ELCITA buildings or work areas at any time. "Smoking" includes the use of any tobacco products, electronic smoking devices, e-cigarettes, vaping devices and similar electronic devices. Smoking is only permitted during break times in designated outdoor areas. While making use of these areas, you are expected to dispose of any smoking debris safely and properly.

Any unlawful or unauthorized use, solicitation, possession, transfer, purchase, sale or distribution of, cigarettes, controlled substances, drug paraphernalia, or alcohol by an individual anywhere on ELCITA premises, while performing ELCITA business (whether or not on ELCITA premises), or while representing ELCITA, is strictly prohibited.

Violation of these rules and standards of conduct will not be tolerated. If you are reasonably suspected to be under the influence of alcohol or an illegal drug while at work, you may be required to undergo and pass a drug or alcohol screening before being allowed to return to ELCITA premises, subject to applicable laws.

### **b. Security/Workplace Violence**

It is the ELCITA's policy to maintain safe working conditions for everyone. It is the obligation of each and every individual associated with ELCITA to observe the safety rules established in each place of work. Observance of safety rules and use of good common sense will assist us all in avoiding accidents. You are expected to comply with the following general safety rules at all times:

- every accident or injury, no matter how slight, must be reported immediately to your Manager;
- report all unsafe conditions to your Manager immediately; and
- do not obstruct exits and fire apparatus.

### **c. Punctuality and Attendance**

You are expected to observe punctuality when reporting for duty. Timely and regular attendance is an expectation of performance for all Staff and Committee Members. To ensure adequate staffing, positive morale, and to meet expected productivity standards throughout the organization, Staff and Committee Members will be held accountable for adhering to their workplace schedule. In the event a Staff member is unable to meet this expectation, he/she must obtain approval from their supervisor in advance of any requested schedule changes. This approval includes requests for late arrivals to or early departures from work. Committee Members who are unable to attend to their duties on a given day must also inform the CEO of ELCITA as soon as possible so that alternate arrangements can be made.

**d. Dress Code**

You must always be dressed appropriately while discharging your duties. You must maintain a well-groomed, professional and neat appearance while at work. If you are inappropriately dressed, you may be sent home to change. A separate Dress Code has or will be provided to you from time to time and you agree to abide by its terms.

Nothing contained herein is intended to discriminate against your religious beliefs or practices or physical or mental disability. If you need an accommodation based on any of the foregoing, you are welcome to contact your Manager or CEO for approvals.

**e. Receipt and Giving of Gifts**

You should not, under any circumstance, accept any offer/payment of, or promise to pay/make pay outs of, money, gifts, or anything of value from or to vendors, consultants etcetera. that may (directly or indirectly) be perceived as influencing any decision, or any other act or failure to act or as an opportunity for the commission of any fraud. Inexpensive gifts and infrequent business meals, provided that they are not excessive or create an appearance of impropriety are permitted, subject to obtaining the necessary approval from either your Manager or the CEO. If you receive any gifts from vendors, suppliers, or other stakeholders, you must immediately bring it to the notice of either your Manager or the CEO, after which a decision will be made on whether it is appropriate to retain the gift or return it to the donor.

**f. Communication Policy**

You must not, at any time, knowingly or otherwise, make, publish using any medium (including social networking sites), or otherwise issue, or procure the making, publication or issue of, any negative statements concerning ELCITA, or any of its officers, members, managers, contractors, employees, agents or representatives.

You must not make or communicate (or cause or facilitate the making or communication of) any oral or written statement to any representative of the press, television, radio or other media on any matter connected with or relating to ELCITA, without the prior written consent of ELCITA.

**g. Confidentiality**

You are responsible for safeguarding any confidential information obtained during the course of your affiliation with ELCITA. You are required to comply with the confidentiality obligations as contained in your Employment Contract or in any other agreement executed by you and as may be issued or communicated to you by ELCITA from time to time.

For the avoidance of any doubt, confidential information means any information that you may come across during your association with ELCITA which has or could have commercial value or other utility with respect to ELCITA's operations. This could include information relating to vendors or suppliers, financial information, reports, and any other data, document, or information that is not generally known to the public. Confidential information also includes any information that, given the nature of the information or the circumstances surrounding its disclosure, reasonably should be considered as confidential information. Do note that confidential information can be disclosed to you in whatever format, including verbal disclosures. Any breach of confidentiality obligations will not be tolerated, and legal action may be taken by ELCITA.

#### h. Prohibited Conduct

The following conduct is strictly prohibited and will not be tolerated by ELCITA. The list of prohibited conduct as mentioned below (“**Misconduct**”) is illustrative only; other types of conduct that threaten the security, personal safety, welfare of individuals associated with ELCITA and its operations would also be covered.

- Falsifying records;
- Theft of / deliberate or careless damage or destruction of any ELCITA property;
- Removing or borrowing ELCITA property without prior authorization;
- Unauthorized use of ELCITA equipment, time, materials, or facilities;
- Provoking a fight or fighting during working hours or on ELCITA property;
- Carrying firearms or any other dangerous weapons on ELCITA premises at any time;
- Engaging in any criminal conduct whether or not related to your duties;
- Insubordination, including but not limited to failure or refusal to obey the orders or instructions of a Manager or CEO;
- Using abusive language at any time on ELCITA premises;
- Failing to notify your Manager or CEO when unable to report to work;
- Unreported absence of *three* consecutive workdays;
- Failure to observe working schedules, including rest and lunch periods;
- Violating any safety, health, security requirements or any ELCITA policy, rule, or procedure;
- Committing a fraudulent act or a breach of trust;
- Use, possession, or sale of any intoxicating substances or illegal drugs on ELCITA premises and/or coming to work under the influence of the same or smoking on ELCITA premises;
- Violating any applicable laws and regulations;
- Excessive tardiness/breach of the dress code, despite repeated warnings; or
- Committing or involvement in any act of harassment.

This is an enforceable code of conduct and violation of the letter or spirit of the code may lead to disciplinary action up to and including termination in the case of Staff members or removal from the Committee in the case of Committee Members. No order of suspension or dismissal (or removal in the case of Committee Members) shall be made unless the Staff or Committee Member has been informed in writing of the alleged Misconduct and given an opportunity to furnish an explanation thereto. If a Staff member is charged with Misconduct, he/she may be kept under suspension pending enquiry and final orders. The order of suspension may be issued simultaneously with or be contained in the charge sheet/show cause notice. During the period of suspension, the Staff member shall not enter the premises except with ELCITA’s prior written permission.

### 7. INFORMATION TECHNOLOGY

#### a. ELCITA Property

For the purposes of this Code, ELCITA property means the property of, or relating to ELCITA including: confidential information (*in any form*), ELCITA mobiles and telephones, laptops and desktop computers, credit cards, equipment, passes, keys, cards, samples, IT/telecommunication log-on details, passwords, disks and documents, correspondence, files, e-mails, memos, reports, minutes, plans, records, surveys, software, diagrams, computer print-outs, manuals, vendor documentation, any electronic storage device such as a USB drive, memory sticks or cards, CDs, hard drives, or any other medium for storing information, including all copies and summaries.



Subject to applicable laws, we reserve the right to inspect all ELCITA property to ensure compliance with its rules and regulations, without prior notice at any time and not necessarily in your presence.

Prior to your last day with ELCITA (or at any other time, if requested by ELCITA), you shall return all ELCITA property including copies of items in good, intact condition. You must not destroy, erase, tamper with or damage any ELCITA property (including, for the avoidance of doubt, any electronic materials) prior to their return, unless otherwise directed to do so in writing by us.

**b. Use of Internet and E-Mail**

Access to the ELCITA's electronic facilities and systems is provided to you solely for use in connection with ELCITA business. We do not encourage personal use of ELCITA resources.

You should not access any offensive information or sites on the Internet using the ELCITA's systems or while at work. In addition, if you receive any e-mails that are or could be considered offensive by anyone, they should not be forwarded within ELCITA. No electronic communication system belonging to ELCITA may be used to send, post, display or download information that contains offensive, derogatory, or obscene language or images, nor may the systems be used to harass or defame any person.

The Internet is not a secure system and is not completely within ELCITA's or the addressee's control. As a result, security is not assured and should not be anticipated when using the e-mail system or Internet access to communicate outside of ELCITA. You should therefore be cautious in transmitting information or documents over the Internet, as the content, recipient, and attachments to any transmission may be disclosed to persons other than the intended recipients. In addition, access to external computer systems, including the Internet, should only take place through approved mechanisms, to assure that ELCITA's security is not compromised. Similarly, you should scan with anti-virus software all documents downloaded from the Internet or other sources to prevent importing computer viruses into ELCITA's system.

ELCITA reserves the right to monitor your usage of the electronic facilities and systems, subject to applicable laws. The IT staff may also monitor equipment, systems and network traffic for security and maintenance purposes at any time without notification. ELCITA reserves the right to audit networks and systems on a periodic basis to ensure compliance with these guidelines. ELCITA only carries out these monitoring activities to the extent reasonably necessary, using what it considers to be the least intrusive means, and with the least impact on the privacy of those individuals concerned.

**c. Social Media Policy and Guidelines**

ELCITA recognizes the value of social media for building personal connections and spreading brand awareness. However, participation in social media, even outside of work and for personal use, can directly or indirectly impact ELCITA, our Staff and Committee Members, and business partners. We expect you to understand and follow the mandatory guidelines below when using social media. These guidelines will be updated as new technologies and social networking tools emerge and evolve.

When using social media (including but not limited to professional and social networking sites such as LinkedIn, Facebook, Instagram, bookmarking sites and social news and information sites such as Twitter, YouTube etc.), it is important to understand that anything you post on social



media sites - including material which may appear to be personal or unrelated to ELCITA - has the potential to be associated with ELCITA. You should keep this in mind at all times and ensure that you are not risking the reputation of ELCITA in any manner through your actions and postings.

The information you post on social media sites is easily accessible by third parties. For this reason, good judgment and caution must be exercised at all times to ensure that your comments and actions do not present reputational or other risks to ELCITA.

You should abide by the following guidelines:

- Never use your ELCITA login name or password on any social media sites.
- Protect your own privacy by limiting the amount of personal and professional information you disclose on social media sites.
- Ensure that your use of social media does not affect your effectiveness and productivity at work.
- Avoid any implication, either direct or indirect, that your views have ELCITA's endorsement. Where appropriate, you should make it clear that any opinions or positions expressed are your own and do not necessarily reflect those of ELCITA.
- Under no circumstances should you post content to social media sites which has the potential to reflect negatively ELCITA's reputation.
- Under no circumstances should you disclose (directly or indirectly) confidential information via social media or any other means.

## 8. EMPLOYMENT POLICIES AND PRACTICES

**Do note that this portion of the Code of Conduct is applicable only to Staff Members.**

### a. Staff Card

A staff card will be provided to Staff members at the time of commencement of employment. It is used for access ELCITA's premises and for access to other staff benefits and facilities. Please report any loss of the staff card to your Manager immediately. Replacement staff cards will be arranged at your expense. It is a disciplinary offence to allow anyone other than yourself to use your staff card. On your last day of employment with ELCITA, your staff card must be returned.

### b. Duties

You shall perform all such duties and responsibilities as are consistent with your designation in a competent and professional manner. You are expected to devote the whole of your working time, attention and skill to the duties of your office. You shall faithfully, efficiently, competently and diligently perform all such duties as may be assigned to you from time to time. It is clarified that your designation/title is merely descriptive. You shall not only discharge your duties and responsibilities as detailed in your Employment Contract but also those that are delegated, assigned and communicated to you from time to time by your Manager.

Your Manager will explain your job responsibilities and the performance standards expected of you. Please be aware that your job responsibilities may change at any time during your employment. From time to time, you may be asked to work on special projects, or to assist with other work necessary or important to the operation of your department or ELCITA. Your cooperation and assistance in performing such additional work is expected.

ELCITA reserves the right, at any time, with or without notice, to alter or change job responsibilities, reassign or transfer job positions, or assign additional job responsibilities, subject to applicable laws.

**c. Hours of Work**

Your working hours will be as follows: 9 AM to 5 PM from Monday to Saturday, except for second Saturday of each month. ELCITA reserves the right to change your working hours and you may be required to work additional hours when requested to do so, or when the proper performance of your work so requires, subject to applicable law.

**d. Remuneration**

The details of your remuneration and the manner of payment shall be set out in your Employment Contract. If you believe there is an error in your compensation amount, you should bring the matter to the attention of your Manager immediately, so that ELCITA can investigate and resolve the matter.

**e. Business Expenses**

You will be paid or reimbursed for any reasonable expenses properly incurred by you while performing your duties on behalf of ELCITA, subject to your: (a) producing receipts for such expenses when requested and (b) complying with ELCITA's prevailing rules and policies relating to expenses. All non-management level Staff members must ensure expenses are approved by their Manager, in advance, in order to have such expenses reimbursed.

**f. Personnel Records**

Every Staff member is required to furnish all particulars, as may be requested by ELCITA at the time of joining (and whenever there is a change) with supporting documentation. You unequivocally consent to ELCITA collecting, using, or disclosing your personal information as specified in the Information Technology (Reasonable Security practices and procedures and sensitive personal data and information) Rules, 2011. Such data or information may be collected, used or disclosed for purposes such as administering the employment relationship, processing payments, conducting background checks, and generally discharging all human resource management activities and for the legitimate interests of ELCITA. You also consent to ELCITA transferring such personal information within the organization to other states, territories or countries as required under applicable law for internal administrative purposes. Further, you irrevocably agree to execute any other additional document(s) which ELCITA / any third-party agency acting on its behalf may require in order to better perfect its rights in this regard. Other than for the purposes mentioned herein, or as specified under your Employment Contract or if required under applicable law, ELCITA will not disclose to any third party or otherwise use in any manner, your personal information without your prior consent.

Every Staff member is required to keep their personnel file up to date by informing ELCITA of any changes to their personal information, including changes to address, contact numbers, educational and professional qualifications, marital status (for benefit enrollment), passport details, bank account number and branch (for pay roll) emergency contact details etc. Unreported changes of address, marital status, etc. can affect withholding tax and benefit coverage.

**g. Leaves**

ELCITA recognizes the need for Staff members to accommodate their personal needs and therefore, to take time off work, occasionally. Staff members may take leave to rest, recuperate from work stresses and for fulfilling social obligations. However, to avoid any reduction in productivity, the leave must be planned well in advance.

If you intend to take leave, you must send an email to your reporting Manager. The mere submission of leave application will not entitle you to take leave, the leave should be approved by the concerned reporting Manager in writing.

For the purpose of calculating the total number of leaves that a Staff member is entitled to, the year shall begin on January 1<sup>st</sup> and end on December 31<sup>st</sup>. Staff members whose date of commencement of employment is at any time after January 1<sup>st</sup> shall be entitled to leave on a pro-rata basis.

Every Staff member shall be entitled to 15 earned leaves, 7 casual and 7 sick leaves as well as 12 national and festival holidays as per applicable law. Female Staff members will also be entitled to maternity leave as per applicable law.

**Acceptance of Code of Conduct**

My signature on this form is to acknowledge that I have familiarized myself with the contents of the Code of Conduct. By my signature below, I acknowledge, understand, accept and agree to comply with the provisions contained in this Code of Conduct, and any other ELCITA policy provided to me from time to time.

I understand that the Code of Conduct sets forth the terms and conditions of my continued affiliation with ELCITA, as well as the duties, responsibilities and obligations of being a Staff or Committee Member. I understand this Code of Conduct is not intended to cover every situation which may arise during my tenure with ELCITA, but is a general guide to the goals, policies, practices, benefits and expectations. This acknowledgement form will be kept in my personnel file with ELCITA.

**Name** :

**Designation** :

**Signature** : \_\_\_\_\_

**Location** : **Electronics City, Bangalore : 560 100**

**Date** :