

NANGIA & CO LLP

CHARTERED ACCOUNTANTS

Ethos & Ethics

A paradigm of professionalism





Simply well said...

No ethic is as ethical as the work ethic.

John Kenneth Galbraith

Relativity applies to physics, not ethics.

Albert Einstein

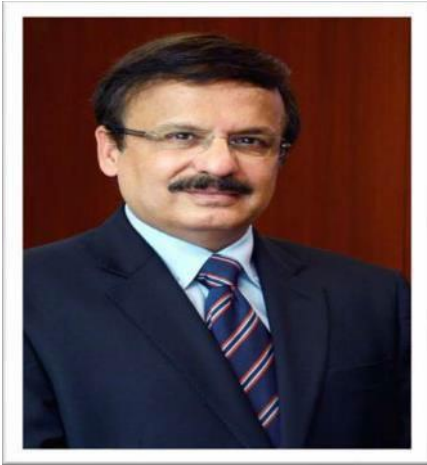
Quality is the best business plan.

John Lasseter

There is no way to succeed in business without the highest ethical standards

Jordan Belfort

Message from our Managing Partner



Mr. Rakesh Nangia

At **Nangia & Co LLP** we are passionate about people, and the opportunity for each of us to reach our own great potential.

Our Code of Conduct is the foundation of our ethics and compliance program. It helps us to articulate our standards of behavior, as we approach our work with professionalism and integrity. Each and every day we seek to make an impact that matters to our people, our communities, and the clients that we serve.

Our shared core values of collaboration, responsibility to society, teamwork, agility, innovation, versatile, excellence and ethical integrity underpin everything we do and hence we name our core values as **CREATIVE**.

Acting in accordance with the Code is a responsibility for all people working with Nangia & co LLP. Each of us is expected to know, understand and comply with the Code. We also have a responsibility to raise our voice when we become aware of anything that is inconsistent with it.

It's our expectation that, after reading this Code, you will have a better sense of your vital role, and of the broad support you have from the highest levels of management. In addition, we believe you will also gain a wider understanding of the privileges and responsibilities that come with being a part of this company and the strong framework in which we can all pursue our individual potential.

Our Core Values

C

COLLABORATION



R

RESPONSIBILITY TO SOCIETY



E

EXCELLENCE



A

AGILITY



T

TEAMWORK



I

INNOVATION



V

VERSATILE



E

ETHICAL INTEGRITY



Code of Ethics



Our Code of Conduct is designed to provide an understanding of the standards of ethical conduct that we express to the outside world. The Code applies to all Nangia & Co. Partners and employees regardless of title or position, and serves as a road map to help guide their actions and behaviors. It describes fundamental ethical principles and efforts to uphold those principles.

We base our decisions on the ethical framework as individuals and members of the Firm

- Upholding and complying with laws of the country
- Respecting Intellectual capital
- Acting with professional integrity
- Synergetic approach to Upholding our clients' reputations as well as our own Treating people and the environment with respect
- Acting in a socially responsible manner
- Working together and thinking about the way we work Considering the ethical dimensions of our actions
- Fully compliant to FCPA & UKBA & similar legislations in other countries

Applicability

Code of Ethics

Defines the fundamental principles and to comply with them otherwise which constitutes professional misconduct.

Nangia & Co Ethical Conduct Policy applies to all its personnel, contractors/ consultants or any third party acting for or on behalf of the Firm. The same applies equally to all its joint operations where Nangia & Co is the operator. To achieve the mentioned objectives, professionals must comply with these principles

- Integrity
- Objectivity
- Professional Competence and Due care before fortifying contracts
- Confidentiality
- Professional Behavior
- Technical standards

Enactments

The First Schedule and the Second Schedule of The Institute of Chartered Accountants of India details the disciplinary action and punitive method in the course of Professional Misconduct, headed by decision making bodies.

Duty to Speak Policy

Nangia & Co relies on everyone who works for or on behalf of the firm to live up to all of its business principles and internal policies by behaving ethically and responsibly. Any failure to work in accordance with our business principles and internal policies represents a risk to the reputation of Nangia & Co. If any breaches occur despite our system of internal controls, reports by personnel and others provide a means for Nangia & Co to initiate proper investigation and to take any necessary action.

Every employee, director or partner of Nangia & Co must follow this policy. We require our personnel, and encourage others, to report any situation where they have a reasonable belief that there has been a breach, or potential breach, of our business principles, internal policies and standards/laws/regulations. Our policy also provides other ways of reporting: For example via internal channels such as the Managing Partner of the firm. Any concerns will be investigated and, where appropriate, feedback will be provided. If it is suspected that a report has not been made in good faith, it will be investigated and, where appropriate, disciplinary action will be taken up to and including dismissal.

We aim to create the climate and opportunities for our people and third parties to do the right thing' and to voice genuinely held concerns about behavior or decisions that they perceive to be contrary to Nangia & Co principles or mandatory internal controls.

Code of Conduct



Collaboration *(Working with clients and others)*

- Our firm is built around our clients and our success depends on their success. We rely upon each other to deliver quality service to our clients and for our individual development.
- We embrace multicultural experience and diversity as strengths of our global organization. As such, we respect one another and strive for an inclusive environment free from discrimination, intimidation and harassment.
- We have brought together the specialist knowledge and expertise and insight to provide the best ideas and serviced to our client.
- We don't wait for the opportunity rather we create one to collaborate with other to share ideas and drive change.
- We support our people and will withdraw from working for any clients that put our people under undue pressure or threaten them in exercising their professional duties.

Responsibility towards our Society

- We do not condone illegal or unethical behavior by our suppliers, contractors and alliance partners. We select suppliers through fair procurement processes
- We recognize our responsibility as an organization in playing an active and positive role in supporting a successful and sustainable society
- We recognize that our business operations and our provision of services may at times impact the environment and we work to reduce harmful effects they might have
- We understand the broader impact that our work has on society, our people, and our clients, and we conduct business with those interests in mind
- We contribute to society and communities by engaging with non-profit organizations, governments, and other businesses to make a positive impact on local, national or global challenges



Excellence *(We never get complacent)*



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Agility *(We thrive in change)*

- We at Nangia & CO LLP adapt according to the changes in the internal and external environment without losing momentum or vision.
- Adaptability, flexibility and balance are three qualities essential to long-term business agility and we thrive to achieve all.
- We promote a culture that cares about and fosters innovation, professional growth, career development, workplace flexibility and work/life balance.
- We listen to each other, we succeed when we collaborate, engage in dialogue, and respectfully debate issues. Pulling together our ideas and collective knowledge is fundamental to our ability to innovate and ultimately to our success.



Teamwork *(we team deliver)*

- We work together to build trust and solve important problems also encourage collaboration, cultivate curiosity and innovation.
- We provide a safe, flexible and healthy working environment for our people which is free from discrimination or harassment and enables people to bring their whole selves to work.
- We believe that talent wins games, but teamwork and intelligence win championships and that is what we thrive in our organization.
- We consult with each other and value the perspectives of those who are different from us, as well as those who challenge our own point of view.
- We expect and deliver feedback regularly, candidly and constructively, and positively recognize success. Bringing out the best in each other and creating strong and successful working relationships.

Innovation *(Continuing success of any organisation)*

- We promote a culture that cares about and fosters innovation, professional growth, career development, workplace flexibility and work/life balance.
- We provide only services we are professionally capable of delivering. We collaborate to bring the necessary skills and innovation to our work. We deliver on our commitments.
- Our firm's unique and innovative culture of shared enterprise means each of us need to be clear about and deliver on the commitments we make to one another.





Versatile *(It's all about being flexible)*

- We support and encourage our colleagues to volunteer and seek new opportunities / training and projects to develop their skills and experiences.
- We continually look for new and improved ways of working.
- We have a six sigma trained team who continuously work on improving the ways work can be completed.
- We make sure to share ideas on how we will become the GO-TO Firm and growth and create value for our clients. After all, as a shared enterprise, it's in all our best interests to share ideas and share responsibility in order to share the reward.

Ethical Integrity *(Doing right even when no one watching)*

- The three areas in which we believe we can make the most impact and deliver our purpose are building trust and integrity in the market, unlocking sustainable growth in dynamic organizations and creating environments where businesses and people flourish.
- We serve only clients that we're competent to serve, who value our service, and who meet appropriate standards of legitimacy and integrity. We are willing to walk away from engagements and clients if our independence, integrity, objectivity, or professionalism could be called into question if we continued.
- We demonstrate our integrity by never engaging in bribery and corrupt practices. This is vital to maintaining the trust of our colleagues, clients, and others we work with.
- We at Nangia and Co LLP comply with all applicable laws and regulations, upholding the highest professional standards, providing sound advice, and rigorously maintaining our independence. Integrity underlies all the principles in.



Implementation of Code of Conduct

We at Nangia & Co adopt the following measures to enforce our Code of Conduct effectively

- Set the tone ‘from top’ by maintaining a sound system of guidelines duly directed and abided by our Top Management.
- To assist with seeking advice or reporting concerns, the firm has established several “channels of communication.” These are formal systems designed to ensure that your question or concern is addressed completely and accurately
- Adopting a risk-based approach, carry out appropriate due diligence assessment prior to entering into a business relationship with third party, and on an ongoing basis with existing counterparties
- Adopting a risk-based approach, carry out appropriate due diligence assessment of risks under potential and existing business relationships.
- Adopt and implement measures to prevent bribes when transacting with our contractors and joint venture partners, and to ensure fair and smooth operations through the supply chain with due respect to the ethics prescribed.
- Provide an independent, confidential reporting line for actual or suspected breaches and other matters of concern to be raised (Speak Up Duty of Report Policy)
- Special dedicated resources to check anticorruption and provide support to monitor effectiveness and detect and deter non-compliance.
- We are committed to creating an environment where we treat each other with respect and trust each other to make the right choices. We encourage and embrace the value that different perspectives bring and appreciate everyone’s contribution to shaping a vibrant economy and the firm’s success.
- Communicate the word and make people aware of the policy guidelines and its practicality

Special Guidelines for Nangia & Co Personnel

Every active personnel working in any capacity is required to familiarize them with this Ethical Conduct Policy and the Standards referred to in this document

- Every active personnel working in any capacity is required to familiarize them with this Ethical Conduct Policy and the Standards referred to in this document
- Operate in accordance with the Anti-Corruption guideline, not giving or receiving bribes in monetary or in kind with contractors or any third parties
- Follow the requirements of the Hosting of Public Officials Standard when interacting with government and public officials
- Ensure a pre-employment screening is undertaken to identify if potential new employees are connected to public officials
- Promptly report any suspected non-compliance with the Ethical Conduct Policy
- In the event of any real or perceived conflict of interest between the performance of their duties for Nangia & Co and their private interest, the personnel should promptly notify their line manager so that timely corrective steps can be taken to manage that conflict in accordance with the conflict of interest standard.
- Not making political donations for or on behalf of Nangia & Co without prior consent.

Ethical standards for using of firm it & electronic communications



Employee Responsibility

- You must not conduct your personal business activities using Company's IT or communication facilities, or support others to do so.
- You must only use approved internet-based services (whether commercial, consumer or free-to-use) to store, process or share business information as defined in the Company policy.
- You must also play your part in protecting company's shared assets – such as a photocopier or a building. Although you are not personally accountable or liable for these,
- you should help to look after them and, if someone else is putting them at risk or using them inappropriately, intervene or report the matter.
- You must identify the privacy risks before collecting, using, retaining or disclosing personal data, such as in an IT system, project or marketing initiative.
- You must use company's brands and trademarks appropriately You must not misuse confidential information of a third party.
- If you notice that a third party is infringing or misusing Company IP rights, for example by passing on documents containing confidential information, it is the duty of that person to speak up.
- You must not engage with the media on behalf of the company without disclosure clearance from the Managing Partner.
- You must not use personal social media accounts for disclosing confidential business information or other business purposes.

Corporate Policy on Prevention of Sexual Harassment



Purpose

Every employee has the right to work in an environment free from harassing, intimidating or offensive behaviour and in which issues of harassment will be resolved without fear of reprisal.

Harassment of employees may include, but is not limited to, physical contact; written and oral remarks, gossip, jokes and banter, defamatory or offensive language and comments; and bullying, where persons in authority abuse their position through insulting, intimidating or malicious behavior.

Scope

This policy applies to all employees of Nangia & Co. LLP

Policy

Harassment will not be permitted or condoned within the organization whether it is based on a person's race, color, ethnic or national origin, age, gender, real or suspected sexual orientation, religion or perceived religious affiliation, disability, or other personal characteristic. The use of Company property, including email, bulletin boards or documents as a vehicle for harassment is prohibited.

Corporate Policy on Prevention of Sexual Harassment *(contd)*

Responsibility

Reporting Managers are expected to take the necessary steps to ensure that employees have the right to work in an environment free from harassing, intimidating or offensive behavior. Managers and supervisors shall consider fully all complaints directed to their attention, maintain confidentiality to the fullest extent compatible with resolving the complaint, and disclose all reports of harassment to management. All employees are expected to take personal responsibility for upholding organization standards by treating with dignity and respect, all job applicants, fellow employees, customers, contract and temporary personnel and any other individuals associated with Nangia & Co. LLP

The HR Head, under the supervision of The Managing Partner, would be authorized to investigate against sexual harassment of women in work-place. Management shall ensure that all investigations are conducted by the designated resource to ensure that prompt corrective action is taken where appropriate.

- Sexual Harassment has been defined by the Hon'ble Supreme Court to include such unwelcome sexually determined behavior (whether directly or by implication) as:
 - Physical contact or advances; Demand
 - or request for sexual favors; Sexually
 - colored remarks;
 - Showing pornography;
 - Any other unwelcome physical,
 - verbal or non-verbal conduct of sexual nature.
- In the event, any female employee of the Company is sexually harassed by a male employee within the meaning of sexual harassment as defined by the Hon'ble Supreme Court, she may make a personal complaint, giving the details of such harassment to the HR Head who will investigate the matter and recommend appropriate action to the Management within a period of three weeks from the date of receipt of the complaint.
- All concerned may be assured that the HR and the Management will maintain the highest level of confidentiality in respect of all matters brought before it.

NANGIA & CO LLP

CHARTERED ACCOUNTANTS

Thank you!

We expect everyone who works at Nangia & co. LLP to behave in accordance with the principles contained in the Code of Conduct. If you do not understand the principles contained within the Code, or are not sure how to apply them, you should consult with an appropriately qualified colleague to get your questions answered.



Our Locations

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