

CODE OF CONDUCT

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OUR VALUES

People mean everything to us; we strive to delight with everything that we do. We will only be the best when we give our best. By thinking about tomorrow, we bring greatness to today. When we connect our communities, we create a better world for all.

ALIVE

We act with passion, energy, and a can-do attitude. Innovation and an entrepreneurial spirit drive us.

INCLUSIVE

We champion diversity. We anticipate, adapt, and deliver solutions that enrich the lives of the communities we serve.

RESPECTFUL

We share the joy and pain of our customers. We act with humility and are always open and honest.

PERSONAL

We will champion individuals, for it is they who make a company with total commitment and passion. For us, the personal is professional.

AGILITY

Speed is of essence and therefore we will always be quick – in responding, in decision-making, in implementation and in reporting.

INTEGRITY

Our ethics are sacred. We will always remain open, honest, and transparent in all our dealings and abide by the laws of the countries and communities we operate in.

EXCELLENCE

We will pursue excellence in serving our internal and external customers by offering a superior experience each time, in every situation.

COMPASSION

We will strive for diversity and also serve the marginalised and differently abled sections of the society by empowering them with knowledge and job opportunities.

OUR UNDERLYING PRINCIPLES

Our Code of Conduct is a public declaration of how we do business and clarifies expectations from ourselves and those we work with as key stakeholders. It also sets the framework for implementation of our corporate policies, guidelines, and procedures.

Many of the policies referred to in our Code of Conduct are available for further consultation on the company's intranet. If you feel there is a conflict between our Code of Conduct and any corporate policies, guidelines, or procedures, you should comply with the most restrictive requirement or seek clarification from your Compliance manager. In ISON, we subscribe to doing business fairly and ethically. Therefore, in our day-to-day business activities, we commit to:

Uphold the highest levels of personal conduct at all times

Integrity and ethical conduct are pivotal in the way we do business. The provisions of the Code of Conduct reflect the values of our company and affirm the company's commitment to the highest standards of integrity and ethics in the conduct of our business.

We demand the same high standards from our business partners and consider whether a prospective partner's values align with our own when making contracting and supplier decisions.

As ISON employees we must avoid situations where personal interests conflict, or even appear to conflict, with the interests of the company such as refraining from giving or receiving gifts and hospitality that may be construed as bribery.

ISON strives to keep a safe work environment by protecting the health, safety and wellbeing of our customers, employees, partners and the communities we operate in at large.

We have a zero-tolerance approach towards sexual harassment, involvement with drugs, modern slavery, human trafficking, child labour and forced labour and expect the same from our business partners.

As an equal opportunity employer, ISON treats all employees fairly and we will conduct our business in a way which respects human rights.

Protect assets and financial integrity of the company

The protection & efficient use of company assets is the joint responsibility of all ISON employees. Company assets include data, computers, phones and data centres. Any involvement in dishonest financial reporting and accounting of ISON or any third party may not only entail disciplinary sanctions but also result in criminal charges.

Respect the laws of the land

ISON employees are required to comply with the laws and regulations of the countries in which we operate. However, as a multinational organization, we acknowledge that this Code of Conduct cannot adequately cover every aspect of ethical behaviour across every geography where we do business.

We therefore call on employees to exercise ethical judgment or consult your compliance manager and always act in compliance with applicable laws when confronted with specific situations that are not explicitly covered in this Code of Conduct.

Where this Code of Conduct conflicts with local law or regulation, the more stringent recommendation should be applied.

The company is committed to the principle of free enterprise and seeks to compete fairly.

The company and our employees adhere to laws and regulations which are designed to ensure effective competition.

Any employee in possession of information is prohibited from using the information for personal gains or divulging the same to a third party. In line with our commitment to doing business with integrity, we exercise a zero-tolerance approach towards bribery and corruption. We denounce any/all forms of money laundering, tax evasion and helping others to evade tax and will always assist in any investigations to detect and penalize any money laundering activities or tax evasion.

Uphold respect in dealing with external partners

In our business dealings we expect our partners to adhere to business values and principles consistent with our own. As part of our values, we respect the communities with whom we do business and we engage with them in ethical and meaningful ways.

ISON does not get politically involved or make donations to groups whose activities are of a political nature. However, we will promote and defend our legitimate business interests by co-operating with

governments and other organizations, both directly and through third parties, in the development of proposed legislation and other regulations which may affect our legitimate business interests.

The views of the company will from time to time be solicited by the public, media, investor groups and analysts, on certain issues. We strongly discourage employees from speaking or writing on behalf of the company unless authorized to do so. Any solicitation of opinion must be directed to our company

website or to the persons authorized to speak on behalf of the company.

OUR RESPONSIBILITIES

Integrity demands that each one of us takes personal responsibility for his/her conduct, ensuring that in our day-to-day work, our decisions, actions and relationships both with fellow employees and external stakeholders are consistent with, and guided by the principles and requirements covered by the Code of Conduct and other policies, guidelines and procedures of the company.

All employees must:

- Learn and understand the elements of the Code of Conduct
- Comply with the Code of Conduct and associated policies, guidelines and procedures
- Seek clarifications and assistance when in doubt
- Promptly report known/suspected violations
- Co-operate in investigations pertaining to alleged Code of Conduct violations

All managers, over and above their responsibilities as employees, must also:

- Build and maintain a culture of compliance
- Actively work towards preventing and detecting problems and issues of compliance
- Respond expeditiously to issues as they emerge (investigate/resolve)
- Follow communication and reporting guidelines as set out in the Code of Conduct.

Who is covered by the overarching Code of Conduct?

The provisions of the Code of Conduct apply to all ISON employees (whether permanent or temporary) working for ISON & its subsidiaries (as well as board members). It also includes our business partners, especially vendors as per earlier reference.

Reporting misconduct

Our obligation to observe the highest standards of personal integrity is more than just an individual responsibility. You also have an obligation to speak up when you see others failing to act with integrity or violating our Code of Conduct.

Non-victimisation

We understand that you may be apprehensive about reporting misconduct. We adhere to a strict policy of non-victimisation for misconduct reported in good faith, even if your concern turns out to be mistaken. You should never fear victimisation or dismissal for making good faith reports of misconduct or suspected violations of our Code of Conduct.

**UPHOLD HIGHEST LEVELS OF PERSONAL
CONDUCT AT ALL TIMES**

- ✓ **RESPECT FOR HUMAN RIGHTS**
- ✓ **HARASSMENT FREE WORKPLACE**
- ✓ **CONFLICT OF INTEREST**
- ✓ **HEALTH & SAFETY**
- ✓ **GIFTS & HOSPITALITY**

Respect for human rights

Objective

ISON recognizes that we can scale new heights only when we operate in an environment where we promote and protect human rights.

We are committed to respecting & upholding human rights in our operations and always ensuring that our employees and business partners, respect the human rights of the colleagues and associated partners that we interact and work with.

We are committed to provide an inclusive culture and work environment where each employee has an equal opportunity to reach his/her maximum capacity. We encourage cultural inclusion and diversity in our workforce.

Code

We will conduct our business in a way which respects human rights. We are committed to combatting any form of slavery, trafficking, child labour, forced labour, inhuman treatment or working conditions that are a threat to life or hinder the physical, emotional and/or mental wellbeing of a person. At ISON, we ensure that all of us embrace the strength of our differences.

We provide equal access to opportunity and treat each other with respect and care. We foster sensitivity and open communication and measure performance of employees only on the basis of their

achievements and contribution towards organizational objectives. We are focused on building a workplace that promotes diversity and appreciates individual differences.

We require that our business partners also abide by these commitments and monitor our business partners' commitment to respect for human rights on an ongoing basis.

Harassment free workplace

Objective

ISON, is committed to being a respectful workplace which recognizes and appreciates differences and treats all its employees with respect and dignity. ISON provides a consistent standard of protection from threats, harassment and discrimination or any other intimidating behaviour to all of its employees.

Code

We are an equal opportunity employer and are committed to creating a safe and conducive work environment that enables employees to work without fear of prejudice, gender bias and/or sexual harassment. We strictly prohibit sexual harassment or any other form of harassment.

We do not tolerate any threats of harm -either direct or indirect - or any conduct that harasses, disrupts or interferes with another employee's work or performance, or creates an intimidating, hostile work environment.

Conflict of interest

Objective

Conflict of interest is a situation in which a person is in a position that he is likely to derive personal benefit financially or otherwise from knowledge gained, or actions or decisions made in their official capacity.

Code

If you find yourself in a position where your personal and organization interest come in conflict, you have to report such conflicts of interest, whether actual, apparent or potential, to the line manager and/or Compliance manager.

ISON employees shall always maintain high standards of business ethics and integrity, making decisions and carrying out activities that keep the best interests of the company over self-interest or personal gain.

Health & safety

Objective

ISON recognizes that sustainable business leadership can only be achieved through a productive workforce, operating in a safe and healthy environment. The company therefore devotes necessary effort and investment in ensuring the physical health and safety of all its employees, and business associates operating within any of its office locations and facilities. ISON also ensures that in the conduct of its activity, its impact on the environment is minimized.

Code

Health and Safety is an essential part of risk management and is given utmost priority at ISON. It is the responsibility of everyone to maintain a clean and organized workspace that does not present any hazard to oneself, colleagues, customers or other partners/visitors, as well as neighbours.

Gifts & hospitality

Objective

ISON maintains a reputation of a transparent, best-in-class company that acts with integrity and bases its decisions only on legitimate business considerations.

In building and maintaining relationships with our various stakeholders, employees must uphold the highest standard of business and personal ethics.

Code

Gifts and entertainment should never be offered or accepted with the intention to influence – or appear to influence – business decisions or relationships in any way. Receiving gifts, inappropriate entertainment or any other gratuities from people with whom we do business, are generally not acceptable, because doing so could imply an obligation that is best avoided.

**PROTECT ASSETS AND FINANCIAL
INTEGRITY OF THE COMPANY**

- ✓ **INTEGRITY OF ACCOUNTING RECORDS & FINANCIAL/NON-FINANCIAL INFORMATION**
- ✓ **PHYSICAL ASSETS & INTELLECTUAL PROPERTY**
- ✓ **CONFIDENTIALITY**
- ✓ **DATA PRIVACY**

Integrity of accounting records & financial/Non-financial Information

Objective

Accurate reporting of financial and nonfinancial information helps management in making the right decisions, builds trust with our external stakeholders and helps us in meeting our legal and regulatory obligations.

It is fundamental to who we are as a responsible organization.

Code

All financial and non-financial information which the company maintains internally for the purpose of management's planning, control and decision making or externally for the purpose of meeting our obligations to external stakeholders must be accurate, reliable and free of bias. Adequate measures should be taken to ensure all information reported is objective, complete and a true reflection of the actual performance. Care must be taken to comply with all statutory and regulatory requirements. Deliberate falsification of records is considered a fraud and may result in criminal liability.

Physical assets & intellectual property

Objective

It is our responsibility to protect and safeguard the company's assets including physical assets, financial assets and intellectual property.

Code

All company assets must be protected against waste, damage, misuse, theft and misappropriation and must be used principally for the business of ISON. The company reserves the right to monitor and track the use of all company assets, including company vehicles etc.

Confidentiality

Objective

Information is a very important company asset and adequate measures must be put in place to protect all information which we come across in our day-to-day work from being used for unintended purposes. Confidentiality of company information helps us maintain the trust of our stakeholders.

Code

All employees are expected to exercise extreme vigilance in protecting the company's information and ensuring that it is not transmitted to unauthorized persons or for unauthorized use. Due care must be taken at all times to maintain confidentiality of personal information, commercially sensitive information and trade secrets relating to the company, its employees or customers.

Data privacy

Objective

Privacy is at the heart of our relationship and social contract with our customers. We are committed to protecting data privacy of our customers and employees in line with best practices and local legislations.

Code

Adequate safeguards should be put in place to protect and safeguard personal information of customers or employees irrespective of the format in which the information is stored. Collection, storage and transmission of personal information should be in accordance with Data Privacy laws and best practice of the company.

RESPECT THE LAWS OF THE LAND

- ✓ **ANTI-BRIBERY & CORRUPTION**
- ✓ **ANTI-MONEY LAUNDERING AND TAX EVASION**
- ✓ **FAIR COMPETITION**

Anti-bribery & corruption

Objective

Bribery and corruption is generally a form of dishonesty or criminal activity undertaken by a person or organization entrusted with a position of authority, often to acquire illicit benefit.

Code

ISON has zero-tolerance to bribery and corruption. Consequently, ISON employees shall at all times act with integrity ensure that all decisions are based on legitimate considerations. In building and maintaining relationships with various stakeholders, employees should focus on creating trust and mutual respect based on the principles laid down in this Code of Conduct.

Anti-money laundering and tax evasion

Objective

Anti-money laundering refers to a set of procedures, laws and regulations designed to stop the practice of generating income through illegal actions or activities. Terrorists, organized criminals and drug smugglers rely extensively on money laundering to maintain cash flow for their activities.

Anti-money laundering regulations generally require institutions engaged in commercial activities to complete due diligence procedures to ensure they are not aiding money-laundering activities. ISON recognises the importance of paying its own tax in accordance with all laws and regulations in the jurisdictions it operates. It also acknowledges the importance of its employees and other persons who perform services for or on behalf of members of the group, clients, suppliers and business partners all paying the taxes they owe, and so is committed to preventing the facilitation of tax evasion by any of these stakeholders. Such facilitation activity may be criminal behaviour and has no place in the group's business – there are no circumstances in which it may be acceptable, and no financial/commercial justification for ever becoming involved in such activity.

Code

ISON recognizes the consequences of participating in illegal activity and the conversion of illegal proceeds into legitimate assets. In this regard, ISON is committed to working with all relevant authorities in order to curb money laundering and tax evasion and to ensure that such practices do not happen in our organization through doing our own vetting/internal checks to ensure that all operations/transactions are legitimate.

ISON is also committed to complying with all anti-money laundering and antitax evasion laws and regulations in the jurisdictions that it operates. Accordingly, ISON expects all group staff to avoid involvement in any money laundering or tax evasion, including facilitating tax evasion by others, in the course of their employment. It operates a zero-tolerance policy for any failure to do so, which will be treated as a disciplinary offence. ISON further expects other persons who perform services for or on behalf of members of the group (including, without limitation, agents, intermediaries, joint venture partners, subcontractors and suppliers) to adopt the same standards in their own activities.

Fair competition

Objective

ISON believes in fair business practices and encourages fair competition with all its business associates. ISON encourages all its employees to practice fair competition as provided by various laws and regulations.

Code

All representatives of ISON shall conduct business with its partners in accordance with relevant laws and regulations in the respective country and international best practices. ISON's employees shall not be part of any unfair business practices that could damage competition, which include misrepresentation to customers/ potential customers, fraud, oppressive or unconscionable acts, anti-competitive agreements with competitors or other stakeholders, anti-competitive information sharing or practices to the detriment of our customers.

**UPHOLD RESPECT IN DEALING WITH
EXTERNAL PARTNERS**

- ✓ **ENGAGEMENT WITH REGULATORY BODIES**
- ✓ **POLITICAL ACTIVITY**
- ✓ **INTERACTING WITH MEDIA**
- ✓ **ENGAGING ON SOCIAL MEDIA**

Engagement with Regulatory bodies

Objective

This section of our Code of Conduct provides guidance on how contact with regulatory bodies must proceed. Regulatory bodies include, Governments, Government Departments; local and other administrative authorities; regulators, legislators, industry associations. Regulatory bodies may be global or international; regional, national; or active at a local community level.

Code

Interaction with regulatory bodies must only be made by authorised individuals. This covers all forms of interactions, whether formal, informal or social interactions that are related to ISON's business including any kind of person-to-person interaction in meeting or via electronic media.

Political activity

Objective

ISON encourages its employees to be responsible and enlightened nationals and fulfil their citizen duties. However, our employees can exercise their right to engage in national, state or local politics

only in personal capacity as long as it is not in conflict with the business interest of the organization. Proper disclosure and approval, where considered necessary needs to be taken. ISON does not support or contribute to any political parties or candidates. Employees also need to clarify that their political actions and views are personal and in no way represent that of the company.

Code

Employees should not make any contribution of company funds, property or services to any political candidate, party or committee. They must not put pressure or solicit other employees to make political contributions or participate in support of a political party or candidate. All political activity, if these do not conflict with the business interest of the organization and are properly disclosed and authorised, where necessary, by the employee needs to be undertaken in their own personal time and using their own resources.

Interacting with media

Objectives

We endeavour to be open and transparent in our communication to ensure that our external stakeholders are kept informed. We are also committed to providing accurate and timely information, thereby safeguarding the company's reputation. All our interactions with media will be with an aim to inform our stakeholders and build our brand reputation.

Code

The Corporate Communications department is the channel to present and share company information to all media. The ISON's Media Policy outlines how interaction with media should be handled.

Engaging on social media

Objective

The phenomenal growth of online social networks e.g. Twitter, Facebook, LinkedIn, Instagram, etc. and leading Instant Messaging services (WhatsApp, WeChat, Viber etc.) is altering the way people communicate, share ideas and disseminate information.

We encourage our employees to participate in social media in a manner that does not expose the company to risks including damage to corporate reputation, legal issues, productivity loss and excessive use of bandwidth, amongst other issues.

Code

We have to be cognizant of the fact that social networking sites are today being followed/seen by customers, regulators and colleagues. We encourage our employees to be our brand ambassadors but it needs to be done in accordance with the rules specified and outlined in the Media Policy (and guidelines).