


**AUTO-
LEK**
A TRUSTED NAME

AIL Code of Conduct

Preface and document control

This document is intended to provide information in respect of ALL standards or guidance and will be periodically updated to reflect any changes due to business requirements or infrastructure. Neither all nor part of this document should be reproduced or released for commercial purposes by a recipient without the express consent of the stated AIL document owner. This document must be reviewed no less than once per year for technical accuracy and business validity. Modifications to this document must be reviewed and approved by the designated AIL Management.

Document owner & approver(s)

Owner	Head HR
Approver(s)	Managing Director/President and CEO 

Version control

Version	Version date	Document history
1.0	July 2017	1 st Formatted Live document.

Internal distribution list (check all applicable departments)

For all Employee's

External distribution

The document owner must approve any request for a copy of this document to be released to an external party. Consideration must be given to the content and classification of this document before authorization is granted. The owner of this document must state the distribution format(s), copying permissions and procedures for document return or disposal.

Version number	1.0	Document type	Standard
Version expiry	Till next amendment	Document classification	INTERNAL USE ONLY
Version status	Live document	Uncontrolled if printed or downloaded	

Code of Conduct

AIL believes that the overall integrity of the Company demands the continuing commitment of all employees. In making decisions on behalf of the Company, as well as in their individual activities in the workplace, employees are expected to always choose an ethical course of action from among the alternatives. No written code can take the place of personal integrity, common courtesy and good judgment. Yet the following general guidelines, which apply to all employees (full-time/part-time) highlight the more important integrity policies of the Company and should serve as a guide to minimum standards of proper conduct.

Code of Integrity: Integrity and a high ethical standard are fundamental to AIL beliefs and are to be upheld by all individuals employed by the company. The company and each employee-must remain committed to obeying all laws and always doing what is right.

These principles are accomplished in dealings with our customers, suppliers, employees and all other external parties with whom we work or whom we encounter while representing the Company, when we:

- obey the letter and intent of the law;
- conduct ourselves in a forthright and honest manner;
- are fair and considerate in all dealings;
- maintain professional behavior and use common courtesy;
- respect the rights and dignity of all individuals as well as the legal rights of all other businesses and organizations;
- make only commitments we believe we can keep — and do our best to keep them;
- use the AIL name only in connection with authorized, legitimate business activities;
- use AIL resources in a manner consistent with the best interests of AIL;
- use our positions at the Company to further only valid business objectives, rather than to further primarily personal interests in order to benefit ourselves, our families, friends, or associates;
- avoid the appearance of any impropriety
- Expect and encourage our chosen business partners and suppliers to maintain similarly high standards of ethical conduct.

Implementation of this Policy requires individual commitment. Following are a series of general guidelines designed to assist all employees in implementing the Policy.

Company assets and records

- 1) **Company assets** -It is the job of all AIL employees to safeguard Company assets. All assets, including financial assets, vehicles, office supplies, equipment, computer software, telephone and internet services, voice-mail and e-mail may only be used for purposes authorized by management. Company computers or networks may only be used in accordance with Company policy and may never be used to access/receive/transmit material that is illegal.

Employees may not loan, borrow, donate, sell or dispose of any Company property unless specifically authorized by the Managing Director or his/her designee. Employees may not use Company property, information or his or her position at the Company for personal gain. Any act that involves theft, fraud, embezzlement, or misappropriation of any property is also prohibited.

- 2) Company books, records and filings** -Investors rely on AIL to provide honest and accurate information and to make responsible business decisions based on reliable records. All financial books, records, accounts, government filings and communications to investors must accurately reflect transactions and events and conform both to generally accepted accounting principles and to AIL's system of internal controls. Undisclosed, misrepresented or unrecorded funds, assets or liabilities are not allowed.

It is never acceptable to make false claims on an expense report or time sheet, to falsify quality or safety results, to record false sales or record them early, to understate or overstate known liabilities and assets or to defer recording items that should be expensed. No entry may be made that intentionally hides or disguises the true nature of any transactions.

Employees must follow the Company's contracts processes and consult with the Legal Department before entering into any contracts, agreements or other legally enforceable commitments (whether written or unwritten) to which the Company is a party.

Company Public Reporting

As a company, it is of critical importance that our filings and submissions with the government bodies be accurate and timely. Depending on your position with the Company, you may be called upon to provide necessary information to assure that the Company's reports and documents filed by the Company are full, fair and understandable. The Company expects you to provide prompt, accurate answers to inquiries related to the Company's public disclosure requirements.

Disclosure or Use of Confidential Information

- 1) Material, Non-Public Information** - Particular care must be exercised with a specific type of Confidential Information. While this term cannot be defined precisely, it includes all factual information with respect to a company or its securities that is not publicly available and might reasonably be expected to affect the name of the company. Both positive and adverse information may be material. The prohibition against misuse of material, non-public information applies to all persons connected with the Company, including employees, members of the Board of Directors, consultants and outside service organizations and their employees. Designated person carrying the information should take steps to limit the disclosure of confidential and material information to those employees with a "need to know," and when disclosure is necessary; all recipients should be counseled to comply with the Policy.
- 2) Protection of Confidential Information** - "Confidential Information" means information about the Company's business, employees, customers, vendors or other entities with which the Company does business that is not available to the general public. It is typically learned by employees in the course of their employment with the Company. Confidential Information includes personnel information, product development, marketing information, strategies, trade secrets, know-how, pricing, etc. Unnecessary copying of documents containing Confidential Information must be avoided. Documents containing Confidential Information should not be left in conference rooms, photocopy areas, on desks or at workstations where they can be seen by outsiders or unauthorized employees.

Similarly, Confidential Information should not be left displayed on computer screens when not in use. Unless otherwise required by the terms of a specific confidentiality or non-disclosure document, additional or extra copies of Confidential Information should be shredded and not discarded in trashcans.

Confidential Information should be disclosed only to those employees of the Company who need to know it to serve the interests of the customer, supplier, development partner, or the Company, and it should not be used for personal gain.

Both during and after employment with the Company, employees are obligated to safeguard Confidential Information. At the end of employment, employees must deliver all materials containing Confidential Information, including copies, notes, and files to the Company. Confidential Information which is not in written form but which is retained in an employee's memory is subject to the same restrictions and prohibitions with respect to disclosure and usage as Confidential Information which is in written or other recorded form.

All employees of the Company also have an obligation to protect the confidential nature of relationships with former, present or prospective customers, suppliers or development partners of the Company. This includes but is not limited to Confidential Information owned by such third parties and disclosed to the Company in confidence. Any Confidential Information about customers, suppliers and development partners that is acquired by employees must be used solely for proper purposes of the Company, and under no circumstances shall such information be revealed to persons who do not have a legitimate AIL business purpose to learn the Confidential Information.

In addition to the restrictions mentioned above, the Company, in many cases, may be bound by the terms of specific confidentiality or non-disclosure agreements. Individuals handling Confidential Information must ascertain whether any such agreement exists and, if it does, adhere to its provisions, which may be more restrictive than, those contained in this guideline.

Conflict of Interest

All employees owe a duty of loyalty to the Company. This duty places on each person the obligation to act in the Company's best interests and to maintain in confidence all proprietary information of the Company, including third party Confidential Information obtained by the Company. Employees must not compete with the Company, and must avoid placing themselves in positions that may produce divided loyalty, or which could create the appearance of divided loyalty. It is the duty of each employee to refrain from using Company property, information or his or her position at the Company for personal gain.

- 1) Outside Employment** - An employee shall not engage in any type of outside employment while employed at the Company, including consulting and self-employment, if the outside employment:
 - may embarrass or discredit the Company;
 - may, in any way, affect the employee's impartiality, objectivity or efficiency in performing his or her duties at the Company
 - involves the use, possible use or disclosure of proprietary or confidential information of the Company or the proprietary or confidential information of others held by the Company;
 - involves, in any way, a supplier, customer or competitor of the Company;

- involves the use of the Company's equipment, supplies, software or other resources; or,
- Is conducted during or otherwise conflicts with the employee's work for the Company.

Gifts and Gratuities

No gifts or gratuities, which could be construed as influencing or rewarding a particular course of action, may be solicited or accepted by a Company employee from, or be given by a Company employee to, any employee or representative of a customer, supplier, the media, any government agency or department or any other organization doing business with the Company.

The giving/ receiving of gifts/gratuities in exchange for influencing or rewarding a particular action is not only prohibited by the Company, but may violate civil or criminal laws, or both. In certain instances, gifts other than money may be accepted or given. These apply equally to business relationships in which the Company is the customer and to those in which the Company is the vendor.

These instances include, food, travel arrangements, accommodations, entertainment or promotional material, all of reasonable value, in the course of a meeting or other occasion whose purpose is to hold bona fide business discussions or to foster better business relations, provided that the expenses would be paid for by the Company as a reasonable business expense if not paid for by another party.

Certain instances may arise in which an employee is publicly presented with a gift of appreciation from a customer or business partner. If, due to local customs, refusal of this gift would harm the business relationship, it is permissible for the employee to accept the gift on behalf of the Company with the gift then becoming Company property.

Equal Opportunities Employer

AIL shall provide equal opportunity to all its employees and all qualified applicants for employment without regards to their race, cast, religion, color, ancestry, marital status, sex, age, nationality, disability and veteran status. Employees of AIL shall be treated with dignity and in accordance with AIL policies to maintain a work environment free of sexual harassment, where physical, verbal or psychological. Employee policies and practices shall be administered in a manner that would ensure that in all matters equal opportunity is provided to those eligible and the decision are based on merit.

AIL in all manners will ensure effective abolition of child and forced labor, directly or indirectly.

Political Non-Alignment

AIL shall be committed to and support a functioning democratic constitution and system. AIL shall not support directly or indirectly any specific political party or candidates for political office. The company shall not offer or give any company funds or property as donations, directly or indirectly, to any specific political party, candidate or campaign.

Health, Safety & Environment

AIL shall strive to provide a safe and healthy working environment and comply, in the conduct of its business affairs, with all regulations regarding the preservation of the environment of the territory it operates in. AIL shall be committed to prevent the wasteful use of natural resources and minimize any hazardous impact of the development, production, use and disposal of any of its products and services on the ecological environment.

Quality of Product and Services

AIL shall be committed to supply goods and services of the highest quality standards backed by efficient after-sales service consistent with the requirement of the customer to ensure their total satisfaction. The quality standards of the company's goods and services should at least meet the required national standards and the company should endeavor to achieve international standards.

Corporate Citizenship

AIL shall be committed to be a good corporate citizen not only in compliance with all relevant laws and regulations but also by actively assisting in the improvement of the quality of life of the people in the communities in which it operates with the objective of making them self-reliant. Such social responsibility would comprise initiating and supporting community initiatives in the field of health and family welfare, eater management, trainings, education etc. This will be reviewed periodically in consonance with national and regional priorities. The company should not treat these activities as optional but would strive to incorporate them as integral part of its business. The company would also encourage volunteering amongst its employees and help them to work in communities.

Ethical Conduct

Every employee of AIL shall deal on behalf of the company with professionalism, honesty, integrity as well as high moral and ethical standards. Such conduct shall be fair and transparent and should be perceived to be as such by third parties. Every employee shall in his business conduct, comply with all applicable laws and regulations, both in letter and in spirit, in all territories in which they operate.

Every employee shall be responsible for the implementation of and compliance with the code in his professional environment. Failure to adhere to the code could attract the most severe consequences including termination of employment.

Citizenship

An employee of AIL shall in his private life be free to pursue an active role in civic and political affairs as long as it does not adversely affect the business or interest of the company.

Reporting Concerns

Every employee of AIL shall promptly report to HOD HR any actual or possible violation of the code or an event s/he becomes aware of that could affect the business or reputation of his/her or of the company.

A concern can be brought to the notice of the Head HR using any of the multiple channels of communication such as letters, telephone, E-mail or personal visit. Head HR will review the concerns raised through proper examination/investigation and the outcome will be communicated to the employee concerned.

Head HR will ensure total and complete confidentiality of the identity of the employee raising the concern. Under no circumstances is the identity of the employee will be revealed. Employee can have complete faith and confidence in the process.

- a) Within three working days from receipt of a complaint, HR shall commence an official inquiry -
 - i) By informing about the said complaint to the accused.
 - ii) By asking an immediate explanation from him/her to the same.
- b) Within seven working days from receipt of the original complaint, Head HR shall respond in writing to the complainant informing him/her about the initial steps taken by the company in order to stop the alleged act(s).
- c) Within Ten working days from receipt of the original complaint, Head HR shall record and accordingly communicate in writing to the complainant and the accused, its prima facie findings or charges in the matter, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counseling sessions with persons involved in the alleged act.
- d) Unless for some compelling reasons, a complaint shall be finally disposed of no later than one month from receipt of the original complaint by recording the decision of the CEO and the management, accordingly informing to the complainant and the accused of the same.
- e) All employees of the company are duty bound to assist in the investigative steps, and the required employees' wholehearted participation shall be mandatory in this regard.

I, _____ (employee), have read, understand and agree to this organization Code of Conduct. I commit to the required standards of behavior and practice as outlined in the Code of Conduct.

Agreed

Employee signature

Date