

Shridevi Enterprises is a partnership firm founded by Ms. Shridevi Hakkak, who has been Manager - Training and Development Human Resource, and also Communication Tools Trainer in Talent Transformation Group, Wipro, Delhi (2003-2007). Later she shifted to Iran after her marriage in 2008 where she worked as a freelance trainer and tourism and travel business for 3 years till 2013 at the young age of 30. Having 8 years of work experience and having extensively travelled in the Middle East and Europe, Shridevi decided to form a partnership firm along with her father Mr. Surender Pal, Retired Deputy General Manager – Indraprastha Power Generation, Delhi, and the current CEO of Sarvamangala Associates.

The Shridevi Enterprises comprises of the following business sectors: Photography (e-commerce), Travel and Hospitality, Education, Services, Distribution of consumer products, and Import and Export of Khadi, Handloom, and Handicrafts. The group intends to have operations in more than 10 countries.

Every Shridevi Enterprise company operates as an independent business. Each of these companies has its own board of directors to whom it is answerable.

Increasing international footprint of Shridevi Enterprises: the brand intends to gain international recognition by providing excellent quality services.

Founded by Shridevi Hakkak in 2013, inspired by the spirit of nationalism, Shridevi Enterprises wants to serve several industries of national importance in India, Travel & Tourism, Hospitality, Education, and promotion of Indian handicrafts and handloom. Its pioneering spirit has been showcased by India's one of the finest Professional Photography and Tourism and Event Management Ventures.

Shridevi Enterprises believes in returning wealth to the society they serve by providing aid and assistance to non-government organisations working in the areas of education and protection of girl child.

Going forward, Shridevi Enterprises is focusing on new technologies and innovation to drive its business in India and internationally. Anchored in India and wedded to traditional values and strong ethics, Shridevi Enterprises is progressing in businesses that will achieve growth through excellence and innovation, while balancing the interests of stakeholders, employees and civil society.

## **Values and purpose**

### **Purpose**

At Shridevi Enterprises we promise to provide quality services. We do this by striving for leadership and global competitiveness in the business sectors in which we operate. Our practice of returning to society what we earn, evokes trust among consumers, employees, stakeholders and the community.

## Core values

Shridevi Enterprises is values-driven. These values continue to direct the growth and business. The five core values underpinning the way we do business are:

- **Integrity:** We must conduct our business fairly, with honesty and transparency. Everything we do must stand the test of public scrutiny.
- **Understanding:** We must be caring, show respect, compassion and humanity for our colleagues and customers around the world and will always work for the benefit of people whom we serve.
- **Excellence:** We must constantly strive to achieve the highest possible standards in our day-to-day work and in the quality of the goods and services we provide.
- **Unity:** We must work cohesively with our colleagues and with our customers and partners around the world, building strong relationships based on tolerance, understanding and mutual cooperation.
- **Responsibility:** We must continue to be responsible, sensitive to the countries, communities and environments in which we work.

## Shridevi Enterprises Code of Conduct

This comprehensive document serves as the ethical road map for Shridevi Enterprises employees and companies, and provides the guidelines by which the group conducts its businesses.

### Foreword

The Shridevi Enterprises Code of Conduct is a set of principles that guide and govern the conduct of Shridevi Enterprises companies and their employees in all matters relating to business. The Code lays down the ethical standards that Shridevi Enterprises employees have to observe in their professional lives, and it defines the value system at the heart of the Shridevi Enterprises group and its business entities.

The Code is a dynamic document that reinforces the Shridevi Enterprises intention of honourable behaviour in business. This code enables it to reflect the diverse business, cultural and other factors that have a bearing on the health of the Shridevi Enterprises brand.

If all of us, in our professional and personal capacities, can internalize the beliefs enshrined in the Shridevi Enterprises Code of Conduct, the Shridevi Enterprises and its future will remain in good hands.

Shridevi Hakkak

Managing Director

Clause: 1

National Interest

Shridevi Enterprises is committed to benefit the economic development of the countries in which it operates. Shridevi Enterprises shall not undertake any project or activity to the detriment of the wider interests of the communities in which it operates.

Shridevi Enterprises management practices and business conduct shall benefit the country, localities and communities in which it operates, to the extent possible and affordable, and shall be in accordance with the laws of the land.

Shridevi Enterprises, in the course of its business activities, shall respect the culture, customs and traditions of each country and region in which it operates. It shall conform to trade procedures, including licensing, documentation and other necessary formalities, as applicable.

Clause: 2

#### Financial Reporting and Records

Shridevi Enterprises shall prepare and maintain its accounts fairly and accurately and in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which the company conducts its business affairs.

Internal accounting and audit procedures shall reflect, fairly and accurately, all of the company's business transactions and disposition of assets, and shall have internal controls to provide assurance to the company's board and stakeholders that the transactions are accurate and legitimate. All required information shall be accessible to company auditors and other authorized parties and government agencies. There shall be no willful omissions of any company transactions from the books and records, no advance-income recognition and no hidden bank account and funds.

Any willful material misrepresentation of, and/or misinformation on, the financial accounts and reports shall be regarded as a violation of the Code, apart from inviting appropriate civil or criminal action under the relevant laws. No employee shall make, authorize, abet or collude in an improper payment, unlawful commission or bribing.

Clause: 3

#### Competition

Shridevi Enterprises shall fully support the development and operation of competitive open markets and shall promote the liberalization of trade and investment in each country and market in which it operates. Specifically, Shridevi Enterprises venture or employee shall not engage in restrictive trade practices, abuse of market dominance or similar unfair trade activities.

Shridevi Enterprises or employee shall market the company's products and services on their own merits and shall not make unfair and misleading statements about competitors' products and

services. Any collection of competitive information shall be made only in the normal course of business and shall be obtained only through legally permitted sources and means.

#### Clause: 4

##### Equal Opportunities Employer

Shridevi Enterprises shall provide equal opportunities to all its employees and all qualified applicants for employment without regard to their race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability - as long as they maintain to the code of conduct of the company.

Human resource policies shall promote diversity and equality in the workplace, as well as compliance with all local labour laws, while encouraging the adoption of international best practices.

Employees of Shridevi Enterprises shall be treated with dignity and in accordance with the Shridevi Enterprises policy of maintaining a work environment free of all forms of harassment, whether physical, verbal or psychological. Employee policies and practices shall be administered in a manner that is consistent with applicable laws and other provisions of this Code, respect for the right to privacy and the right to be heard, and that in all matters equal opportunity is provided to those eligible and decisions are based on merit.

#### Clause: 5

##### Gifts and Donations

Shridevi Enterprises and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended, or perceived, to obtain uncompetitive favours for the conduct of its business. The company shall cooperate with governmental authorities in efforts to eliminate all forms of bribery, fraud and corruption.

However, Shridevi Enterprises and its employees may, with full disclosure, accept and offer nominal gifts, provided such gifts are customarily given and/or are of a commemorative nature.

#### Clause: 6

##### Government Agencies

Shridevi Enterprises and its employees shall not, unless mandated under applicable laws, offer or give any company funds or property as donation to any government agency or its representative, directly or through intermediaries, in order to obtain any favourable performance of official duties. Shridevi Enterprises shall comply with government procurement regulations and shall be transparent in all its dealings with government agencies.

Clause: 7

#### Political Non-alignment

Shridevi Enterprises shall be committed to and support the constitution and governance systems of the country in which it operates.

Shridevi Enterprises shall not support any specific political party or candidate for political office. The company's conduct shall preclude any activity that could be interpreted as mutual dependence/favour with any political body or person, and it shall not offer or give any company funds or property as donations to any political party, candidate or campaign.

Clause: 8

#### Health, Safety and Environment

Shridevi Enterprises shall strive to provide a safe, healthy, clean and ergonomic working environment for its people. It shall prevent the wasteful use of natural resources and be committed to improving the environment, particularly with regard to the emission of greenhouse gases, and shall endeavour to offset the effect of climate change in all spheres of its activities.

Shridevi Enterprises, in the process of production and sale of its products and services, shall strive for economic, social and environmental sustainability.

Clause: 9

#### Quality of Products and Services

Shridevi Enterprises shall be committed to supply goods and services of high quality, backed by after-sales services consistent with the requirements of its customers, while striving for their total satisfaction. The quality standards of the company's goods and services shall meet applicable national and international standards.

Shridevi Enterprises shall display adequate health and safety labels, caveats and other necessary information on its product packaging.

Clause: 10

#### Corporate Citizenship

Shridevi Enterprises shall be committed to good corporate citizenship, not only in the compliance of all relevant laws and regulations but also by actively assisting in the improvement of quality of life of

the people in the communities in which it operates. The company shall encourage volunteering by its employees and collaboration with community groups.

Shridevi Enterprises are also encouraged to develop systematic processes and conduct management reviews, as stated in the Shridevi Enterprises sustainability protocol, from time to time so as to set strategic direction for social development activities.

The company shall not treat these activities as optional, but should strive to incorporate them as an integral part of its business plan.

#### Clause: 11

##### Cooperation of Shridevi Enterprises

Shridevi Enterprises shall cooperate with other joint ventures, by sharing knowledge and physical, human and management resources, and by making efforts to resolve disputes amicably, as long as this does not adversely affect its business interests and company's values. In the procurement of products and services, Shridevi Enterprises shall give preference to other Shridevi Enterprises ventures, as long as they can provide these on competitive terms relative to third parties.

#### Clause: 12

##### Public Representation

Shridevi Enterprises honours the information requirements of the public and its stakeholders. In all its public appearances, with respect to disclosing company and business information to public constituencies such as the media, the financial community, employees, stakeholders, agents, franchisees, dealers, distributors and importers, Shridevi Enterprises shall be represented only by specifically authorised directors and employees. It shall be the sole responsibility of these authorised representatives to disclose information about the company.

#### Clause: 13

##### Third Party Representation

Third parties which have business dealings with the Shridevi Enterprises, such as consultants, agents, sales representatives, distributors, channel partners, contractors and suppliers, shall not be authorized to represent Shridevi Enterprises without the written permission of Shridevi Enterprises and/or if their business conduct and ethics are known to be inconsistent with the Code of Shridevi Enterprises.

Third parties and their employees are expected to abide by the Code in their interaction with, and on behalf of, Shridevi Enterprises. Shridevi Enterprises is encouraged to sign a non-disclosure agreement with third parties to support confidentiality of information.

#### Clause: 14

##### Use of Name and Trademarks

The use of the Shridevi Enterprises name and trademarks under it shall be governed by manuals, codes and agreements to be issued by Shridevi Enterprises Managing Director. The use of the Shridevi Enterprises brand is defined in and regulated by the Shridevi Enterprises manual. No third party or joint venture shall use the Shridevi Enterprises brand to further its interests without specific authorization from Shridevi Enterprises.

#### Clause: 15

##### Enterprise Policies

Shridevi Enterprises shall recommend to its board of directors the adoption of policies and guidelines periodically formulated by Managing Director and Executive Committee of Shridevi Enterprises.

#### Clause: 16

##### Stakeholders

Shridevi Enterprises shall be committed to enhancing company value and to complying with all regulations and laws that govern stakeholder rights. The board of directors of Shridevi Enterprises shall duly and fairly inform its stakeholders about all relevant aspects of the company's business, and disclose such information in accordance with relevant regulations and agreements.

#### Clause: 17

##### Ethical Conduct

Every employee of Shridevi Enterprises, including full-time directors and the chief executive, shall exhibit culturally appropriate behaviour in the countries they operate in, and deal on behalf of the company with professionalism, honesty and integrity, while conforming to moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be so by third parties.

Every employee of Shridevi Enterprises shall preserve the human rights of every individual and the community, and shall strive to honour commitments.

Every employee shall be responsible for the implementation of and compliance with the Code in his/her environment. Failure to adhere to the Code could attract severe consequences, including termination of employment.

Clause: 18

#### Regulatory Compliance

Employees of Shridevi Enterprises, in their business conduct, shall comply with all applicable laws and regulations, in letter and spirit, in all the territories in which they operate. If the ethical and professional standards of applicable laws and regulations are below that of the Code, then the standards of the Code shall prevail.

Directors of Shridevi Enterprises shall comply with applicable laws and regulations of all the relevant regulatory and other authorities. As good governance practice they shall safeguard the confidentiality of all information received by them by virtue of their position.

Clause: 19

#### Concurrent Employment

Consistent with applicable laws, an employee of Shridevi Enterprises shall not, without the requisite officially-written approval of the company, accept employment or a position of responsibility (such as a consultant or a director) with any other company, nor provide freelance services to anyone, with or without remuneration. In the case of a full-time director or the chief executive, such approval must be obtained from the managing director of the company.

Clause: 20

#### Conflict of Interest

An employee or director of Shridevi Enterprises shall always act in the interest of the company, and ensure that any business or personal association which he/she may have does not involve a conflict of interest with the operations of the company and his/her role therein. An employee, including the executive director (other than independent director) of Shridevi Enterprises, shall not accept a position of responsibility in any other non- Shridevi Enterprises or not-for-profit organization without specific sanction.

The above shall not apply to (whether for remuneration or otherwise):

- a) Nominations to the boards of Shridevi Enterprises joint ventures or associate companies.
- b) Memberships/positions of responsibility in educational/professional bodies, wherein such association will benefit the employee/Shridevi Enterprises.
- c) Nominations/memberships in government committees/bodies or organizations.
- d) Exceptional circumstances, as determined by the competent authority.



Competent authority, in the case of all employees, shall be the chief executive, who in turn shall report such exceptional cases to the board of directors on a quarterly basis. In case of the chief executive and executive directors, the Executive Council shall be the competent authority.

An employee or a director of Shridevi Enterprises shall not engage in any business, relationship or activity which might conflict with the interest of his/her company or Shridevi Enterprises. A conflict of interest, actual or potential, may arise where, directly or indirectly...

- a) An employee of a Shridevi Enterprises engages in a business, relationship or activity with anyone who is party to a transaction with his/her company.
- b) An employee is in a position to derive an improper benefit, personally or to any of his/her relatives, by making or influencing decisions relating to any transaction.
- c) An independent judgment of the company's or Group's best interest cannot be exercised.

The main areas of such actual or potential conflicts of interest shall include the following:

- a) An employee or a full-time director of a Shridevi Enterprises conducting business on behalf of his/her company or being in a position to influence a decision with regard to his/her company's business with a supplier or customer where his/her relative is a principal officer or representative, resulting in a benefit to him/her or his/her relative.
- b) Award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative of an employee of a Shridevi Enterprises, where such an individual is in a position to influence decisions with regard to such benefits.
- c) The interest of the company or the Group can be compromised or defeated.

Notwithstanding such or any other instance of conflict of interest that exist due to historical reasons, adequate and full disclosure by interested employees shall be made to the company's management. It is also incumbent upon every employee to make a full disclosure of any interest which the employee or the employee's immediate family, including parents, spouse and children, may have in a family business or a company or firm that is a competitor, supplier, customer or distributor of or has other business dealings with his/her company.

Upon a decision being taken in the matter, the employee concerned shall be required to take necessary action, as advised, to resolve/avoid the conflict.

If an employee fails to make the required disclosure and the management of its own accord becomes aware of an instance of conflict of interest that ought to have been disclosed by the employee, the management shall take a serious view of the matter and consider suitable disciplinary action against the employee.

Clause: 21

Securities Transactions and Confidential Information

An employee of Shridevi Enterprises and his/her immediate family shall not derive any benefit or counsel, or assist others to derive any benefit, from access to and possession of information about the company or Group or its clients or suppliers that is not in the public domain and thus, constitutes unpublished, price-sensitive insider information.

An employee of Shridevi Enterprises shall not use or proliferate information that is not available to the investing public, and which therefore constitutes insider information, for making or giving advice on investment decisions about the securities of the respective Shridevi Enterprises, Group, client or supplier on which such insider information has been obtained.

Such insider information might include (without limitation) the following:

- Acquisition and divestiture of businesses or business units.
- Financial information such as profits, earnings and dividends.
- Announcement of new product introductions or developments.
- Asset revaluations.
- Investment decisions/plans.
- Restructuring plans.
- Major supply and delivery agreements.
- Raising of finances.

An employee of Shridevi Enterprises shall also respect and observe the confidentiality of information pertaining to other companies, their patents, intellectual property rights, trademarks and inventions; and strictly observe a practice of non-disclosure.

Clause: 22

#### Protecting Company Assets

The assets of Shridevi Enterprises shall not be misused; they shall be employed primarily and judiciously for the purpose of conducting the business for which they are duly authorized. These include tangible assets such as equipment and machinery, systems, facilities, materials and resources, as well as intangible assets such as information technology and systems, proprietary information, intellectual property, and relationships with customers and suppliers.

Clause: 23

#### Citizenship

The involvement of a Shridevi Enterprises employee in civic or public affairs shall be with express approval from the chief executive of his/her company, subject to this involvement having no adverse impact on the business affairs of the Firm.

#### Clause: 24

##### Integrity of Data Furnished

Every employee of a Shridevi Enterprises shall ensure, at all times, the integrity of data or information furnished by him/her to the company. He/she shall be entirely responsible in ensuring that the confidentiality of all data is retained and in no circumstance transferred to any outside person/party in the course of normal operations without express guidelines from or, the approval of the management.

#### Clause: 25

##### Reporting Concerns

Every employee of a Shridevi Enterprises shall promptly report to the management, and/or third-party ethics helpline, when she/he becomes aware of any actual or possible violation of the Code or an event of misconduct, act of misdemeanour or act not in the company's interest. Such reporting shall be made available to suppliers and partners, too.

Any Shridevi Enterprises employee can choose to make a protected disclosure under the whistleblower policy of the company, providing for reporting to the chairperson of the audit committee or the directors or specified authority. Such a protected disclosure shall be forwarded, when there is reasonable evidence to conclude that a violation is possible or has taken place, with a covering letter, which shall bear the identity of the whistleblower.

The company shall ensure protection to the whistleblower and any attempts to intimidate him/her would be treated as a violation of the Code.

#### Note:

The Shridevi Enterprises Code of Conduct does not provide a full, comprehensive and complete explanation of all the rules that employees are bound to follow. Employees have a continuing obligation to familiarize themselves with all applicable laws, company policies, procedures and work rules.

All Sub Businesses or Joint ventures could adopt Shridevi Enterprises Code of Conduct or a joint code of conduct incorporating all elements of the Shridevi Enterprises Code of Conduct.

This version of the Shridevi Enterprises Code of Conduct supersedes all earlier versions and associated documents and stands effective from October 17, 2013.