



Employee Code of Conduct and Discipline Policy 02-12-2021

Definition

Employee Code of Conduct and Discipline policy defines employees' behavior towards their colleagues, supervisors and overall organization. This help freedom of expression and open communication. All employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

Objective

The objective of this policy is to ensure that every member of the team behaves in a professional, business-like manner at work, on the premises, and whenever representing DHPL. The success of the company is dependent to a large extent upon maintaining a high level of public trust and professionalism. Therefore, each employee is expected to conduct himself at all times in accordance with the highest levels of honesty and integrity. The Code of Conduct identifies particular responsibilities that each employee must assume in order to attain the vision of the company. We cannot have a comprehensive set of rules that can detail every circumstance to which they may apply, but the code does provide essential guidelines for day-to-day direction. This policy applicable to all level employees.

General –

Every individual must carry out his/ her responsibilities to the organization in a trustworthy manner and must be careful to avoid situations that could present a conflict of interest or an appearance of a conflict. All employees must follow our dress code and personal appearance guidelines. Everybody must carry his/ her id cards and display it at all times for security reasons. Employees are requested to check their attendance records on HRMS and discrepancies, if any, should be reported to the HR department. Falsifying of attendance or giving proxy is a serious offence and can result in dismissal

Respect in the workplace

All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations

Job duties and authority

All employees should fulfill their job duties with integrity and respect towards customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competence and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

Avoid conflict

Do not have any potential interest, financial or non-financial, that may impair (or appear to impair) the individual's independent judgment when performing working responsibilities.

Corruption:

Avoid receiving any material, financial, or other benefit by communicating or passing any information, secrets, which may come into their possession as a result of the employment. We prohibit bribes for the benefit of any external or internal party. We discourage employees from accepting gifts from clients or partners

Fill a Declaration Form

Fill Declaration form disclosing whether any family member is working for a competitor or is in the same line of business

Protection of Company Property

Take utmost care of company's property (e.g. computers, software, furniture, sign boards, etc) and save it from damage, theft or remaining idle Avoid wasteful expenditure e.g. switch off computers from the power source when not using the system, avoid waste of stationery, optimize courier packets and so on. Avoid use of paper/printer, if soft copies can serve the purpose. Use printer on 'Draft' mode only for internal requirements. Should respect all kinds of incorporeal property. This includes trademarks, copyright and other property ') (information, reports etc.) Employees should use them only to complete their job duties.

Housekeeping

Keep one's surroundings and workstations neat and tidy

Communication

Do not represent to media or public as official spokesperson for the company without being compliant with the company's guidelines for communication All employees must be open for communication with their colleagues, supervisors or team members.

Office time and assets usage

Avoid using office assets for personal requirements, company's telephones (mobile and fixed), fax machines, computers, copiers, courier services, office stationery and other business equipment's. Use of these facilities is permitted if, for emergency or insignificant requirement. If expenditure is significant, say more than 1/10th of one day's salary, the same should be communicated to the HR department for record and recovery from salary if absolute amount is over Rs 500. Refrain from doing any personal work during office hours or while in office. Exceptions are allowed only if time taken is insignificant or if extra-ordinary inconvenience may be caused if that work is not done at that particular time.

No alcohol/ smoking/ drugs while at work

Smoking on office premises is strictly prohibited. Smoking means use of lit cigarette, cigar, pipe or any other lit tobacco product. Nobody should be under the influence of alcohol or illegal or controlled substances when reporting to work, while on the job, or in connection with carrying out official responsibilities

ETHICS AND INTEGRITY

We expect all our people to display the highest standards of ethical and moral conduct in all their acts on duty as well as when not on duty. We consider unethical or immoral conduct as a serious violation of terms of employment, even if committed when the individual is not at the workplace or is not on official duty. Such cases shall be taken seriously by As a company, we can live with errors and mistakes done in good faith even if they result in significant losses, but can never condone lack of honesty and integrity, even if there is no monetary damage.

The following is an illustrative list of do's and don'ts:

- ✓ Everybody shall ensure, at all times, the integrity of data or information in his/ her possession or control and which pertains to the company or its business

- ✓ All employees should read and follow our company policies. If they have any questions, they should ask their managers or Human Resources (HR) department.
- ✓ There are certain acts and behaviors, which can result in very strict disciplinary action including immediate termination of service. They include Forging documents (e.g., Customer's Insurance/ broking application form/ KYC- supporting documents such as identity/ birth proof)
- ✓ Overstating expenditure vouchers
- ✓ Taking cash from customers
- ✓ Referring business to competition
- ✓ Trading in customer account without customer consent
- ✓ Overstating customer pass-back/ incentives, sub broker payments
- ✓ Multiple instances of being late for office or for customer meetings without adequate reasons
- ✓ Not recording customer telephone numbers, email or any relevant detail in company database. This inhibits company's access to its most valuable asset namely its customers
- ✓ Fraudulent and incorrect reporting of customer meetings or sales or business data on DISC or through any other mode of communication
- ✓ Fudging or abetting fudging of attendance records
- ✓ Gross negligence in protecting company's property or customers
- ✓ Immoral or unruly conduct, acts of or amounting to sexual harassment
- ✓ Physical violence with customer/ colleague/vendor

Salary

- ✓ All employees of DHPL and its group companies should maintain confidentiality of their salaries. Salaries in DHPL are person/business/activity/location specific and should never be shared or compared with a peer / colleague. Doing so is not only unethical but is against the company's policy also.
- ✓ No employee(s) is permitted to discuss their salaries and compensation benefits with colleagues & peers. Employee(s) found sharing their salary information with colleagues and peers shall invite strictest disciplinary action including termination from the services of the company.
- ✓ Speculating and rumor mongering on the same is also prohibited and DHPL policy shall apply as this data is confidential and is for personal information only, therefore please do not discuss it over a cup of tea / any other beverage or otherwise also.
- ✓ The company or its authorized employee can only use this data for any statutory purpose or any employee welfare scheme(s)

Every Employee is:

- ✓ Required to maintain information like client details, product information, incentives, all computer files, employee details, etc in strict confidence
- ✓ Expected not to communicate or pass any information, secrets, which may come into their possession as a result of the employment with DHPL to any outsider or to anyone not employed by DHPL . Also, any communication received by the employee on the company's letter-head (appointment letter/ increment letter/ pay slips, etc) is also to be treated as confidential. Details like salary and increments cannot be discussed with others in the organization
- ✓ Expected not to use or proliferate information, which is not available to the investing public and which therefore constitutes insider information for making or giving advice on investment decisions
- ✓ Respective Managers are responsible and are accountable for knowing the confidentiality policies and guidelines that pertain to their area and are also responsible for informing employees about restrictions on confidential information.

Disciplinary actions

DHPL may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

OFFENCE / MISCONDUCTS	1ST TIME	2ND TIME	3RD TIME	4TH TIME	5TH TIME
Drinking Alcoholic Beverages or using Drugs on office hours	Warning	Show cause notice	5-day suspension	Demotion	Dismissal
Failures of duties and responsibilities	Warning	Show cause notice	5-day suspension	Demotion	Dismissal

Unauthorized Leave. Leaves and late coming without proper approval, irregular attendance, Excessive Leaves	Warning	Show cause notice	3-day suspension	Demotion	Dismissal
Disclosing & sharing of any information, policy, procedures, records Etc relating to company that comes into possession during the course of work and not maintaining strictest secrecy about affairs of the company to any unauthorized person/s	Show cause notice	10-day suspension	Dismissal		
Sexual Harassment	Show cause notice	Dismissal			
Stealing, Theft, Fraud, Embezzlement with Company's business (Cash/Gold/Documents etc) or with other employees.	Show cause notice, Dismissal & Legal Action				
Refusal to Accept a Reasonable & Proper Order from an Authorized Supervisor (Insubordination)	Warning	Show cause notice	5-day suspension	Demotion	
Falsification of Records, giving false personal information etc.	Warning	Show cause notice	5-day suspension	Dismissal	
Gross Negligence that leads to financial loss to company	Show cause notice	5-day suspension	Dismissal		
Going on an illegal stoppage of work/ abetting, instigating of action in furtherance thereof	Show cause notice	5-day suspension	Dismissal		
Fighting, Malicious Use of Profane/Abusive Language to Others, making false / malicious complaints to superiors	Show cause notice	5-day suspension	Demotion	Dismissal	
Unauthorized use/ Destruction or misuse of company Equipment or Property.	Show cause notice	5-day suspension	Dismissal		
Unauthorized Solicitation or Sales on company Premises	Show cause notice	5-day suspension	Demotion	Dismissal	
Loitering, idling or wasting time in office, Interference with Other Employees Work without their and superiors' instructions	Warning	Show cause notice	5-day suspension	Demotion	
Gambling during working hours	Warning	5-day suspension	Demotion	Dismissal	
Working on Personal Jobs during Work Hours	Warning	Show cause notice	5 day suspension	Demotion	
Excessive Use of Telephone for Personal Matters	Warning	Show cause notice	5 day suspension	Demotion	
Engaging in Unlawful Work Stoppages, Slowdowns or Strikes	Show cause notice	Dismissal			
Conviction in any Court of Law for an offence involving moral turpitude	Dismissal				

