

Code of Conduct, Ethics & Professional Conduct Policy

1. Purpose

Skillventory / Skillventory Recruitment Consulting LLP / Skillventory Manpower Service LLP is committed to conducting its business with honesty, integrity, professionalism, and in compliance with all applicable laws and regulations. This Code of Conduct establishes the standards of ethical and professional behaviour expected from all individuals associated with the Company.

The purpose of this Policy is to:

- Promote ethical business conduct;
 - Protect the Company's reputation, assets, and confidential information;
 - Encourage compliance with legal and regulatory obligations;
 - Foster a respectful, inclusive, and professional workplace environment; and
 - Provide guidance for addressing ethical concerns and conflicts of interest.
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2. Scope

This Policy applies to all employees including Interns, Temporary Staff, Contractual Staff, Consultants, Senior Consultants, DMs, Managers, Senior Managers, VP, AVP, Directors, vendors, and representatives associated with:

- Skillventory Recruitment Consulting LLP
- Skillventory Manpower Service LLP
- Skillventory
- Any affiliated entities of the Company (If Any)

This Policy applies equally to all individuals irrespective of designation, role, tenure, department, employment type, or seniority.

3. Equal Opportunity, Respect & Non-Discrimination

Skillventory / Skillventory Recruitment Consulting LLP / Skillventory Manpower Service LLP is committed to maintaining a workplace free from discrimination, harassment, retaliation, bullying, victimization, or unfair treatment based on gender, religion, caste, race, ethnicity, nationality, age, disability, marital status, sexual orientation, gender identity, socio-economic background, or any other characteristic protected under applicable law.

All employees are expected to treat colleagues, customers, clients, vendors, and other stakeholders with dignity, professionalism, fairness, and respect.

Any form of harassment, intimidation, abusive conduct, or discriminatory behaviour will not be tolerated.

4. Standards of Professional Conduct

Every employee and representative of the Company is expected to:

a) Honesty & Integrity

Conduct Company business honestly, ethically, responsibly, and in good faith while exercising due care, diligence, and professional judgment.

b) Professional Behaviour

Maintain professional behaviour at all times and avoid conduct that may harm the Company's reputation, operations, or workplace environment.

c) Compliance with Laws & Policies

Comply with all applicable laws, regulations, Company policies, procedures, and internal controls.

d) Respectful Workplace Conduct

Maintain respectful and professional relationships with colleagues, customers, vendors, and stakeholders.

e) Protection of Company Reputation

Avoid any activity, behaviour, or communication that may negatively impact the

Company's reputation, credibility, or business interests.

f) Accurate Information & Records

Provide accurate, complete, and reliable information in all Company records, reports, communications, and documentation.

g) Cooperation

Cooperate fully in any audit, enquiry, review, or investigation conducted by the Company or any authorized authority.

5. Conflict of Interest

Employees and representatives must avoid situations where personal interests conflict, or appear to conflict, with the interests of the Company.

Examples include:

- Engaging in outside employment or business activities that interfere with Company responsibilities;
- Using Company position or information for personal gain;
- Conducting Company business with relatives or associated entities without appropriate disclosure;
- Accepting benefits or favours that may improperly influence business decisions.

Employees must promptly disclose any actual, potential, or perceived conflict of interest to Human Resources or Management.

Employees are expected to disclose relationships only where a direct or indirect reporting relationship, decision-making authority, conflict of interest, favoritism concern, or workplace professionalism issue may reasonably arise.

6. Confidentiality & Data Protection

All confidential, proprietary, financial, operational, employee, customer, vendor, or business-related information obtained during the course of employment must be protected and used only for authorized business purposes.

Employees shall not:

- Disclose confidential information to unauthorized individuals;
- Share Company information with the media or public without authorization;
- Use confidential information for personal benefit or external advantage.

These obligations continue even after separation from employment.

7. Insider Trading & Sensitive Information

Employees and representatives shall not use or share unpublished price-sensitive or confidential business information for personal financial gain or for assisting others in investment decisions.

All individuals are required to comply with applicable laws including the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, where applicable.

Violation of insider trading laws may result in disciplinary action and legal consequences.

8. Gifts, Hospitality & Improper Benefits

Employees and representatives shall not directly or indirectly offer, solicit, accept, or provide any gifts, payments, hospitality, donations, favours, entertainment, or other benefits intended to improperly influence business decisions, secure preferential treatment, or obtain any unfair advantage.

Employees and representatives may accept customary business hospitality, including modest meals, refreshments, or food coupons provided during business meetings, client visits, conferences, or professional interactions, provided such hospitality is reasonable in value, legally permissible, infrequent in nature, and does not create any actual, potential, or perceived conflict of interest or improper influence.

Gifts of commemorative or customary nature not exceeding INR 500 may be accepted where legally permissible and where they do not compromise professional judgment, business integrity, or the Company's interests.

9. Protection & Proper Use of Company Assets

Employees are responsible for safeguarding Company assets, property, systems, data, equipment, and resources against misuse, theft, loss, damage, or unauthorized use.

Company assets and resources must be used responsibly and primarily for legitimate business purposes.

10. Misconduct, Policy Violations & Disciplinary Action

The following may result in disciplinary action, up to and including termination of employment. This list is illustrative and not exhaustive:

- Gross misconduct or behaviour that materially harms the Company's reputation, operations, workplace environment, or legitimate business interests;
- Misuse, theft, or unauthorized use of Company property, systems, assets, or information;
- Material falsification, misrepresentation, or concealment of employment, educational, identity, or background verification information;
- Willful insubordination or refusal to comply with lawful and reasonable instructions;
- Threatening, abusive, violent, discriminatory, harassing, or disruptive behaviour;
- Unauthorized use of alcohol, narcotics, or prohibited substances during work hours or on Company premises in a manner that impairs workplace safety, performance, or professional conduct.
- Unauthorized disclosure of confidential information;
- Fraud, corruption, bribery, or other conduct materially inconsistent with this Policy, Company policies, or applicable law;
- Betting, gambling, or unlawful activities on Company premises;
- Unauthorized work stoppage or incitement to violence;
- Repeated unauthorized absenteeism, excessive tardiness, or failure to follow attendance procedures without reasonable justification;
- Habitual neglect of duties or repeated indiscipline;
- Conviction by a court of competent jurisdiction for a criminal offence that materially impacts the individual's ability to perform their role, workplace safety, integrity, or the Company's legitimate business interests;
- Failure to report serious misconduct or policy violations within one's reporting structure where the employee was aware of material misconduct and had a reasonable opportunity to report it through appropriate channels.

- Any other conduct inconsistent with Company policies, legal obligations, or professional standards.

All reported violations shall be reviewed fairly, objectively, confidentially, and in accordance with principles of natural justice.

Appropriate disciplinary action, if any, will depend on:

- Severity of the misconduct,
 - Available evidence,
 - Applicable laws and policies, and
 - Impact on the Company and workplace environment.
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11. Responsibilities of Employees & Management

Employees

All employees are responsible for:

- Understanding and complying with this Policy;
- Acting ethically and professionally;
- Reporting suspected violations in good faith;
- Seeking guidance when uncertain about appropriate conduct.

Managers & Leadership

Managers and leadership personnel are expected to:

- Lead by example;
 - Promote ethical conduct and legal compliance;
 - Ensure employees receive appropriate guidance and support;
 - Address concerns promptly, fairly, and professionally.
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12. Reporting Violations & Non-Retaliation

Employees are encouraged to report suspected violations of this Policy, unethical conduct, harassment, discrimination, fraud, conflicts of interest, or legal non-compliance without fear of retaliation.

All concerns raised in good faith will be reviewed appropriately and confidentially to the

extent reasonably possible.

Retaliation against any individual who reports a concern in good faith or participates in an investigation is strictly prohibited.

Concerns may be reported to:

- HR Department
- Reporting Manager
- Authorized Management Representative

Email: astha.s@skillventory.com / hr@skillventory.com

13. Periodic Review & Acknowledgement

The Company reserves the right to amend, revise, interpret, or withdraw this Policy at its discretion and in accordance with applicable law.

Employees may be required to periodically acknowledge that they have read, understood, and agreed to comply with this Policy.

All new employees and representatives shall acknowledge this Policy at the commencement of their association with the Company.

14. Conclusion

This Policy is intended to promote a culture of professionalism, ethics, accountability, inclusiveness, and mutual respect across the organization.

All employees and representatives are expected to uphold these standards and contribute positively toward maintaining a safe, respectful, ethical, and legally compliant workplace environment.

Skillventory / Skillventory Recruitment Consulting LLP / Skillventory Manpower Service LLP does not support or tolerate any form of harassment, discrimination, bullying, retaliation, intimidation, victimization, or abusive conduct and is committed to maintaining a safe, respectful, inclusive, and professional workplace environment for all individuals.