

CODE OF CONDUCT POLICY

Process Owner & Approving Authority

Director of Finance and Operation and managers

1.0 Overview

It is vital to the success of Aflatoun International that we conduct our work with honesty and integrity and in compliance with all applicable legal and regulatory requirements.

2.0 Objective

This Code of Conduct sets out the fundamental standards to be followed by employees in their everyday actions on behalf of the organization.

3.0 Eligibility & Coverage

All employees of Aflatoun

4.0 Policy

4.1 Business Integrity: Aflatoun International, its employees, and the associated workforce shall carry out all business with utmost integrity and reliability. Any display of malpractices related to or affecting the business will be recognized as a violation of the code of conduct and will be subject to severe disciplinary action.

4.2 Compliance with company policy & procedures: All employees shall at all time work in accordance with the organization's policy, which is in compliance with applicable laws, government rules and regulations.

4.3 Environmental compliance: Aflatoun conducts its operations in an environmentally responsible business manner and in strict compliance with applicable environmental laws and standards.

4.4 Unlawful practice or harm to the organization's reputation or image: The organization and its employees shall at no time resort to unlawful methods of working to gain business advantage. Every employee will be expected to preserve the organization's reputation through all business dealings. The organization shall have a zero-tolerance policy for violation of governing rules, regulations, and laws. Employees shall be expected to abide by ethical principles.

4.5 Protection from Sexual Exploitation and Abuse (PSEA): Upon signature of an Employee contract with Aflatoun, all employees have to adhere to Aflatoun's policy on PSEA and attend the PSEA online course.

4.6 Child Protection Policy: All employees shall adhere and sign off Aflatoun's child protection policy.

4.7 Cyber security: All employees shall strictly abide by all applicable laws and regulations regarding cyber security, data protection and money laundering of the countries/ provinces/ states in which they operate and shall not infringe the freedom of communication and privacy of end users.

4.8 Conflict of interest: The organization and its employees shall at no cost participate in activities which compromise the interest of the organization for personal gain and interest. The organization's interest shall be second to none. No employee will seek full time or part time job or be involved in any way with competitor's business activities either directly or indirectly during employee employment with the organization.

4.9 Integrity in communication & confidential information: All employees must maintain integrity in their internal and external communication and high confidentiality of information entrusted to them. Disclosure of any such information shall only ensue if authorized or mandated. No permanent employee will at any time within a year of employment with Aflatoun disclose or use, either during current or subsequent employment, any organization's sensitive information, knowledge or data which is received or developed during his/her employment which is considered proprietary by Aflatoun. This includes information relating to products, processes, technical presentations, know-how, customers, designs, drawing, formulas, test data, marketing data, accounting, pricing, salary information, business plans, strategies and contracts.

4.10 Intellectual property: Aflatoun International holds exclusive rights to all intellectual property created by and for Aflatoun. All employees shall respect and work towards protecting the moral and economic rights of the creator.

4.11 Protecting organization's assets: All employees should protect the assets of the organization and ensure their efficient use. Organization assets shall only be used for legitimate purposes.

4.12 Equal opportunity: Aflatoun shall provide an equal opportunity for employment with no discrimination on the grounds of race, sex, caste, religion, colour, marital status, gender, nationality, age, ethnicity, sexual orientation, and disability.

It shall be the responsibility of the organization and its employees alike to maintain an environment devoid of prejudices.

4.13 Gifts and donations/favour from interested parties: Aflatoun and its employees are not permitted to accept, make or offer any gifts, payments, remunerations and donations as a business favour. Gifts received indirectly must be reported to HR.

4.14 Public representation of the company: Only authorized persons designated by the organization are to divulge business and other relevant information to any public medium such as the media, the financial community, employees, shareholders, agents, franchisees, dealers and distributors. Employees are prohibited from voicing opinions about the organization and its functions on social networking sites like 'Facebook', 'twitter' or 'LinkedIn'. The organization shall closely monitor any such material and reserves the right to take action.

4.15 Discharging the duties: Every employee shall carry out respective duties in alignment with the organization's value system, striving at all times to withhold the organization's name in high regard.

4.16 Management action on non-compliance with CoC: The organization and all its employees shall stringently apply the Code of Conduct. Failure to do so will result in disciplinary actions that could lead to termination of service. Employees are expected to keep abreast with the updated version of policies.

4.17 Action against partners on non-compliance with CoC: Refer to partners' Code of conduct document.

Aflatoun reserves the right to supplement and change this Code of Conduct at any time, and Aflatoun will share the amended version with its partners and employees.