

Code of Business Ethics and Integrity (Part of Human Resource Manual)

INDEX

1.	Message from Deki	1
2.	Deki Standards of Business Ethics & Integrity	1
3.	Discussing and Reporting Compliance Concerns and Complaints	2
4.	Conflicts of Interest and Corporate Opportunities	4
5.	Confidential Information	5
6.	Compliance with Laws, Rules and Regulations	6
7.	Gifts, Entertainment, Bribes, and Kickbacks	7
8.	Corruption Risk Assessment Procedure	8
9.	Non-Retaliation and Procedure	10
10.	Guidelines for Appropriate Conduct	13
11.	Personal Phone Calls and Personal Business	15
12.	Use of Communication Systems	15
13.	Company Property	15
14.	Whistle Blower Policy & Procedure	15
15.	Waiver	16

MESSAGE FROM DEKI

The reputation of Deki Electronics Ltd is one of its most valuable assets. It sets the tone for the relationships that the Company enjoys with its employees, shareholders, customers, suppliers, communities in which we operate and the public at large. DEKI has built its reputation as a world-class organization over three decades, and we must continually reinforce those values upon which our reputation has been built—honesty, ethical conduct, and compliance with law. DEKI's Standards of Business Integrity address many subjects, but the message is always the same: each employee is expected to comply with both the spirit and letter of these standards and the laws of the country.

DEKI STANDARDS OF BUSINESS INTEGRITY

Core Value

DEKI is committed to high standards of ethical and responsible conduct in compliance with applicable laws. At its most basic level, this requires dealing fairly and honestly with employees, customers, suppliers, shareholders, competitors, the public, and the communities in which we work. DEKI's reputation is built on the individual actions of each of its employees and representatives, and therefore you have an essential role in meeting this commitment.

In addition to being the right thing to do, enforcing strong ethical and legal compliance makes good business sense. Questionable business practices and shortcuts do not work in the long run. Only responsible, ethical behavior leads to sustainable business success.

These Standards

These standards are not intended to be all-inclusive. Nor do they purport to address every question or issue that you might encounter in the workplace. These standards, however, do highlight certain issues that you are likely to confront in your day-to-day work. They are designed to help you comply with DEKI policies and increase your awareness of key compliance and ethical issues.

If you have any questions about proper conduct in any situation that might be covered by these standards, consult with your HOD or Human Resource Department.

Applicability and Effect

These standards apply to all employees of Deki Electronics Limited.

DEKI takes these standards very seriously, and non-compliance, depending upon the circumstances, will result in serious disciplinary action up to and including termination of employment.

Expectations

Employees will:

- Comply with both the spirit and letter of these standards and the laws of the India.

Managers/Supervisors will:

- Foster an atmosphere that demonstrates the importance of these standards and act as role models regarding integrity compliance.
- Ensure that all employees under your direct and indirect supervision familiarize themselves with these standards and receive appropriate training.
- Establish internal controls designed to prevent and detect non-compliance with these standards.
- Ensure that agents, representatives, and others hired to act on behalf of the Company are aware of these standards and agree to act accordingly.

DISCUSSING AND REPORTING COMPLIANCE CONCERNS AND COMPLAINTS

Ensuring compliance with these standards is not just the job of the Legal Cell, or Senior Management. It is every employee's job.

Meeting DEKI's high integrity standards requires your active engagement and alertness to identify possible non-compliance.

How To Report A Compliance Issue

If you suspect that non-compliance has occurred at your workplace, report your concern to your supervisor or HRD.

It is a violation of DEKI policy for any person to retaliate against any individual who has made a report in good faith. Any employee who takes any retaliatory action against any person who has in good faith raised any questions or concerns about compliance with any DEKI policy will be subject to discipline that may include termination of employment. In the event that a DEKI employee files any allegation of retaliation with a government authority, DEKI will cooperate with such government investigation.

Expectations

Employees will:

- Alert proper personnel to possible non-compliance, as well as unacceptable behaviors such as pressure to compromise standards.
- Report any concerns you have about compliance in your workplace through any of the channels previously described.
Participate with any investigation into possible non-compliance.

Managers/Supervisors will:

- Maintain an open working environment in which employees feel free to report any suspected non-compliance, free from retaliation.
- Report to the HRD any complaints or allegations regarding suspected non-compliance or retaliation.
- Be aware that misunderstandings or conflicts can arise in any organization. To ensure effective working relations, it is important that such matters be resolved before serious problems develop. Most incidents resolve themselves naturally; however, should a situation persist that you believe is detrimental to your employment with the Company, you should follow the procedure described below for bringing your complaint to management's attention.

Step One: Discussion of the problem with your immediate supervisor is encouraged as a first step. If, however, you do not believe a discussion with your supervisor is appropriate, you may proceed directly to Step Two.

Step Two: If your problem is not resolved after discussion with your supervisor, or if you feel discussion with your supervisor is inappropriate, you are encouraged to request a meeting with DEKI's HRD. In an effort to resolve the problem, the Human Resource specialist will consider the facts and may conduct an investigation.

DEKI does not tolerate any form of retaliation against employees availing themselves of this procedure. The procedure should not be construed, however, as preventing, limiting, or delaying the Company from taking disciplinary action against any individual, up to and including termination, in circumstances (such as those involving problems of overall performance, conduct, attitude, or demeanor) where the Company deems disciplinary action appropriate.

DEKI provides its employees with a convenient and reliable method for reporting incidents of alleged harassment, including sexual harassment. Any employee who believes that they have been or are being harassed or discriminated against is encouraged to immediately inform the alleged harasser that the behavior is unwelcome. In most instances, the alleged harasser is unaware that their conduct is offensive, and when so advised can easily and willingly correct the conduct so that it does not reoccur. If the informal discussion with the alleged harasser is unsuccessful in remedying the problem, or if such an approach is either not possible or comfortable for the employee, the employee should immediately report the complain of conduct to both their immediate supervisor, manager, or DEKI's senior management. Employees may also go directly to the HRD. The report should include all facts available to the employee regarding the harassment.

CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES

Avoid actual and potential conflicts of interest in performing your duties for DEKI and do not advance personal interests at the expense of DEKI.

We expect you will act in the best interests of DEKI and avoid conflicts of interest by making reasoned and impartial decisions. A conflict of interest may arise whenever a personal interest interferes with—or even appears to interfere with—the interests of DEKI. A conflict of interest can also arise when you take an action or have an interest that makes it difficult for you to perform your work objectively and effectively. While we respect your right to manage your personal business and investments, you should place DEKI's interest in any business transaction ahead of any personal interest or gain, when the opportunity to do so arises.

Identify and pre-clear conflicts – As an employee, it is your responsibility to identify potential conflicts when they arise and to notify the HRD of DEKI or any of such person's direct reports if you are unsure whether a relationship or transaction poses a conflict before engaging in conduct or as soon as you learn of the potential conflict. The MD of DEKI will be able to pre-clear or resolve certain conflicts, or will be able to contact someone else at DEKI who can. Each DEKI employee is required to inform the MD of DEKI or any of such person's direct reports of any potential or actual conflict of interest that he or she may have with DEKI.

Examples of conflicts – The following are examples of conflicts of interest that could arise and are prohibited unless they have been pre-cleared or resolved in advance:

- You or someone with a close relationship with you receives improper personal benefits (such as cash, gifts, entertainment, services, discounts, loans, guarantees, or selection by DEKI as a supplier, consultant, or business partner) from a DEKI client, vendor, partner, associate, or any other party you come into contact with as a result of your position at DEKI;
- Your work as an officer, director, employee, or consultant to another company interferes with your ability to do your job at DEKI, or the other company competes with DEKI;
- You take for yourself a business opportunity which you discovered through DEKI property or information or through your position at DEKI without first offering it to DEKI, if you believe that DEKI might reasonably have a business interest;
- You use DEKI property, information, or your position at DEKI for personal gain;
- Someone with a close relationship with you is in a direct reporting relationship with you, or you have the ability to supervise, review, or influence the job evaluation, hiring, pay, or benefits of someone with a close relationship with you who also works at DEKI; or
- You allow any investments held by you or someone in a close relationship with you to influence you in your work for DEKI. Except under any arrangements made for employees by DEKI, you must not use any DEKI transaction for your own—or any other individual's—personal investment purposes. This does not apply to the use of a DEKI product that is directed to the consumer market.

Keep in mind that not all conflicts are prohibited and the list above does not address every example. Some conflicts are permissible if they are disclosed and approved. Because it is impossible to describe every potential conflict, we rely on your commitment to exercise sound judgment and to seek advice when appropriate.

CONFIDENTIAL INFORMATION

Protect the confidentiality of nonpublic information about DEKI and its clients and partners.

As a part of your job or position, you may learn or have access to nonpublic or inside information relating to DEKI businesses, operations, or technology. If information is not in the public domain, you should treat it as confidential—and where there is any doubt, or if you do not have the ability to confirm whether something is confidential, treat it confidentially.

You should not share confidential information with anyone, including individuals within DEKI, unless there is a legitimate “need-to-know” and you are authorized to do so. Improper disclosure of confidential information could put us at a competitive disadvantage or could hurt or embarrass DEKI or other employees.

Examples of confidential information – Confidential information includes some of our most valuable assets, such as the following examples:

- Trade secrets;
- Pricing policies and information;
- Business or strategic operating plans and outlooks;
- Nonpublic financial information about DEKI or our customers and business partners;
- New product, brand or marketing studies, developments, plans, or forecasts;
- Customer data, including contact details, specifications, and preferences;
- Contracts and agreements, including terms such as expiration dates, any exclusivity provisions, and financial conditions;
- Subscription lists;
- Employee lists with contact information;
- Software or computer programs;
- Merger, acquisition, or divestiture plans; and/or
- Personnel plans or major management changes.

Customer/Partner information and privacy – We also respect confidential information regarding other companies—especially our customers. If you learn of confidential information about another company in the course of your job or as a result of your position (and you do not report on this information as a DEKI employee), you should protect it the same way that you would confidential information about DEKI. Disclosure of confidential information can be harmful to DEKI and could be the basis for legal action against DEKI and/or the employee responsible for the disclosure.

Safeguarding confidential information – If you have confidential information, you should store or safeguard it where unauthorized people cannot see or access it.

Your obligation to safeguard DEKI's nonpublic information or other confidential information applies to you even after you leave DEKI for as long as the information remains confidential and is not generally available to the public.

You should only disclose confidential information outside of DEKI after appropriate steps have been taken, such as obtaining written authorization to do so and signing a confidentiality agreement or non-disclosure agreement (NDA) to prevent misuse of the information.

COMPLIANCE WITH LAWS, RULES, AND REGULATIONS

Know and comply with laws, rules, and regulations applicable to your job or position.

As a company, we are subject to numerous laws, rules, and regulations. While we do not expect you to be a legal expert, you are expected to understand and comply with laws, rules, and regulations applicable to your job or position and know when to seek advice from DEKI's Legal Cell. Any violation of laws, rules, or regulations applicable to us could jeopardize our reputation. Fraud, dishonesty, or criminal conduct will not be tolerated.

As is appropriate for your job responsibilities and position, you should:

- Learn about laws, rules, and regulations that affect what you do at DEKI;
- Attend periodic training and keep informed about any relevant legal or regulatory developments; and
- Consult with an expert if you have any question about the applicability, existence, or interpretation of any law, rule, or regulation.

Comply with environmental laws and regulations that apply to DEKI – You have a responsibility to conduct our operations in a manner that complies with environmental laws and regulations, and that minimizes any adverse effect on the environment. We believe that protecting the environment is an important part of being a good corporate citizen. If your job involves contact with regulated materials or if you are involved in decisions about them, you should understand how those materials can be safely handled to protect you and your fellow employees from harm.

Reporting – If you find yourself in a position that you believe may violate a law, rule, regulation, this policy, or another DEKI policy, you must report the violation, or what you believe or suspect is a possible violation. You can report your concerns to the Legal Cell of DEKI or any of such person's direct report.

GIFTS, ENTERTAINMENT, BRIBES, AND KICKBACKS

Gifts and entertainment

You should be very careful about accepting business courtesies from companies who do business or seek to do business with DEKI. Business courtesies include meals, drinks, entertainment, sports tickets, transportation, promotional items, and the like. Generally, DEKI policy requires an employee to obtain written approval from his or her supervisor before accepting any business courtesy from a vendor or supplier with a value greater than INR 1000. No employee shall solicit or accept for personal use, or for the use of others, any gift, favor, loan, gratuity, reward, promise of future employment, or any other thing of monetary value that might influence, or appear to influence, the judgment or conduct of the employee in the performance of their job.

Employees can accept occasional unsolicited courtesy gifts or favors (such as business lunches, tickets to sporting events or cultural events, holiday baskets, flowers, etc.) as long as the gifts or favors have a market value that is considered reasonable and customary in the industry, and do not influence or appear to influence the judgment or conduct of the employee. Any such monetary favor should be discussed with the HRD of the Company.

Employees are not to give, offer, or promise directly or indirectly anything of value to any representative of a customer, potential customer, vendor, potential vendor, financial institution, or potential financial institution with whom the Company has or may have a business relationship.

Bribes and kickbacks

Bribes and kickbacks are strictly prohibited and can create legal exposure for the Company and for you personally. The giving or acceptance of a bribe or kickback will result in possible criminal prosecution. The Company will cooperate with any government investigation or criminal prosecution regarding illegal bribes or kickbacks, whether or not the employee believed the acts were in the best interest of the Company.

Expectations

Employees will:

- Not request personal gifts, favors, entertainment, or other services from an existing or prospective vendor, supplier, or customer.
- Refuse any business courtesy offered to you or any family member that is not consistent with DEKI Policy or otherwise appears to be given in order to obtain undue influence.
- Not offer or accept any bribe or kickback, either directly or indirectly.

Inappropriate gifts or entertainment: The appropriateness of a gift, entertainment, or favor, whether given or received, depends upon many factors, including its value, purpose, and the setting in which it is given or received. If the gift, meal, or entertainment is lavish or unusual in

relation to customary business practices, it is probably not acceptable. If you are in the middle of transaction negotiations, bid evaluations, or dealing with a government employee, it is probably not acceptable for you to receive a gift. Prohibited gifts, entertainment, or favors, either given or received, include but are not limited to:

- Gifts of cash, or cash equivalents
- Gifts to government officials and employees
- Entertainment of a offensive, or illegal nature

Bribes and kickbacks: A bribe is anything of value given to someone with the intent of obtaining favorable treatment from the recipient. Kickbacks consist of payment in cash or kind, including goods, services, or forgiving any sort of obligation provided to a customer or supplier for the purpose of improperly obtaining or rewarding favorable treatment in connection with a sale or purchase. You should consult with the HRD if you have a question as to whether any payment or providing something of value could be considered a bribe or kickback.

CORRUPTION AND BRIBE RISK ASSESSMENT

To avoid corruption and bribe risk in the activities of company's business, the company will educate its employee, suppliers and associates about corruption issues & risks and encourage for reporting in case of non-compliance. The company will discuss the issues and risk of corruption in the forum like vendor meet with suppliers, contractors and associates and conduct formal/in-formal risk assessment.

PROCEDURE FOR CORRUPTION RISK IDENTIFICATION, RISK ASSESSMENT AND DETERMINING CONTROL

Purpose:

To identify corruption risk, conduct risk assessment and determine controls.

Scope:

All activities, products & services which is related to govt. approvals, customers and vendors

Responsibility:

Top & Middle Management

Procedure:

- a) The top management alongwith middle level managers will identify, conduct risk assessment and determine control measure on yearly basis to avoid negative impact of corruption risk associated with the organization.

- b) The risk assessment records will be evaluated with regards to change in rules/regulations and requirement of buyers.
- c) The employees especially those who are dealing with govt. departments, customers and suppliers will be sensitized about corruption risk and control measure including informing and reporting to the top management.
- d) All concerned employees will be provided training to comply with applicable statutory and regularly requirements properly.
- e) Corruption Risk will be evaluated and ranked as follows:
- Unlikely - 1
 - Likely - 2
 - Highly Likely - 3
- f) The Level of the consequence/Impact shall be ranked as
- Low - 1
 - Medium - 2
 - High - 3
- g) Risk Classification (Risk Ranking) is calculated by multiplying level of consequence/impact with likelihood of risk. Risk classification depends on risk ranking i.e
- Low - 1-2
 - Medium - 3-6
 - High - 7 & above
- h) Risk Control action plan will be decided on the basis of risk classification which are tabulated below

Risk Classification	Risk Control Action Plan
Low (1-2)	A.S.A.P.
Medium (3-4)	Urgent (Report to the Management)
High (7 & above)	Immediate ((Report to the Management)

- i) High Corruption Risk will be considered for setting anti-corruption programs.
- j) HRD will act as coordinator for all issues related to this procedure.

NON-RETALIATION

Retaliation is strictly Prohibited and will not be Tolerated: Deki will not allow anyone to retaliate against an employee or employee of supplier or visitor who either reports a violation or suspected violation in good faith or cooperates in an investigation. Retaliation is itself a breach of this code and cause for disciplinary action, up to and including termination of employment or services.

As an employee of Deki, you must report any suspected ethical misconduct of employee of suppliers, to your Supervisor or HRD and also protect them from retaliation or other consequences. The concerned officer of Deki will then report the same to the Management of Supplier Company.

PROCEDURE FOR CONFIDENTIALITY REPORTING SUSPECTED ETHICAL MISCONDUCT FOR WORKER AND PROTECT THEM FROM RETALIATION AND OTHER CONSEQUENCES

This procedure aims to:

- Encourage employees to feel confident in raising serious concerns in those cases where they do not wish to use the normal reporting routes within their departments.
- Provide alternative avenues for raising concerns.
- Ensure that responses to concerns are made
- Reassure employees that they will be protected from possible retaliation or victimization.

There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. This procedure is intended to cover major concerns that fall outside the scope of other procedures and include:

- Conduct which is an offence or a breach of law.
- Health and safety risks, including risks to the public as well as other employees (where the concerns raised have not been addressed through normal departmental procedures)
- Damage to the environment
- Fraud and corruption
- Sexual or physical abuse
- Other unethical or unprofessional conduct
- Notification of any suspicions of price-fixing cartels providing services/goods to the company

Retaliation/Harassment or Victimization

The company recognizes that the decision to report a concern can be a difficult one to make, not least because of the fear of retaliation from the person(s) who is the subject of the complaint. However, if employees state the truth they should have nothing to fear because

they will be doing their duty to their employer and those for whom they are providing a service. The company will not tolerate any form of sexual, racial or general harassment, retaliation or victimization and will take appropriate action to protect employees when they raise a concern in good faith.

Confidentiality

All concerns will be treated in confidence and every effort will be made to protect an employee's identity if that is their wish. At the appropriate time, however, they may need to be called as a witness, following a full factual investigation of the concerns raised.

Untrue Allegations

If an employee makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, they make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

How to Raise a Concern

1. The person with whom the concern is raised is referred to as the respondent.
2. Employees who wish to raise a serious concern should do so verbally or in writing (marked 'Confidential') to the HR-Head.
3. If the HR-Head is the subject of the concern, the matter will be raised to the Vice President.
4. If the employee considers it inappropriate to raise the matter with the HR-Head or a Vice President, the matter should be raised directly to the Managing Director.
5. Alongside the above, the employee may consider discussing the matter with their works committee for advice and support.

How the HR-Head or Vice President will respond

1. The matters raised may be investigated by the HR-Head or Vice President as appropriate which may include the disciplinary process or form the subject of an independent inquiry.
2. In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.
3. Within 10 working days of a concern being raised, the above authority will write to the employee concerned at their private address:
 - a. acknowledging that the concern has been received
 - b. indicating how he proposes to deal with the matter
 - c. telling the employee whether any initial enquiries have been made
 - d. telling the employee whether further investigations will take place and, if not, why not
4. If the matter is subject to further investigation the employee will be kept informed

- of the progress and will be told of the timescale for the investigation.
5. The company will take steps to minimize any difficulties which may be experienced as a result of raising a concern. For instance, where an employee is required to give evidence in criminal or disciplinary proceedings the company will arrange for them to receive advice about the procedures involved.
 6. The company accepts that employees need to be assured that matters of concern have been properly addressed and, therefore, subject to legal constraints, employees will be informed of the outcome of any investigation.

How the matter can be taken further

This Procedure is intended to provide employees with an avenue to raise concerns. The company hopes employees will be satisfied with any action taken. If an employee considers that the nature of the matter is such that this procedure cannot be used or if they are not satisfied with the action taken, then they can approach to the Managing Director.

PROCEDURE FOR CONFIDENTIALITY REPORTING SUSPECTED ETHICAL MISCONDUCT FOR EMPLOYEE'S OF SUPPLIERS AND PROTECT THEM FROM RETALIATION AND OTHER CONSEQUENCES

Any employee of supplier may submit a good faith complaint of ethical misconduct regarding accounting, misconduct, allegations of sexual harassment, or health and safety matters to the management of the Company without fear of harassment or retaliation of any kind. The Company is committed to receive, respond and resolve such complaints of ethical misconduct and protect the employee of supplier from any kind of harassment or retaliation.

In order to facilitate the confidential reporting of employee of vendor, the Company has established the following procedures for the receipt, retention and treatment of confidential reporting of suspected ethical misconduct.

Receipt of Complaints / confidential report

The employees of vendor with concerns regarding accounting, misconduct, allegations of sexual harassment, or health and safety matters may forward their concerns or complaints on a confidential or anonymous basis through any of the following methods:

Phone to the HOD – Materials or Vice President (0120-2585457/58)

E-mail sent to sangeeta@dekielectronics.com or shanker@dekielectronics.com

On receipt of the complaint, the case will be investigated by the company's authorized officer and information will be sent to the employee of vendor or vendor directly.

If the complaint alleges a serious matter then the matter will be forwarded to the Managing Director for overall direction.

If the complaint alleges a matter that can be routinely handled by the Company's existing processes and internal controls, then the company will turn such matter over to the Company representative who is responsible for such area.

The company will retain a record of all complaints including the nature and resolution of the complaint.

The Company will maintain the confidentiality of all complaints, reports and investigations made hereunder, to the fullest extent possible, consistent with the need to conduct an appropriate review and investigation of complaints and reports made hereunder.

Prohibition of Retaliation

Retaliation against any person who in good faith reports a complaint or concern hereunder, or who participates in or otherwise assists in an investigation related thereto, is strictly prohibited and will not be tolerated. Any act of retaliation should be reported immediately and will be disciplined appropriately.

GUIDELINES FOR APPROPRIATE CONDUCT FOR EMPLOYEES OF THE COMPANY

As a Company team member, employees are expected to accept certain responsibilities, follow acceptable business principles in matters of conduct, and exhibit a high degree of integrity at all times. This not only involves sincere respect for the rights and feelings of others, but also demands that employees refrain from any behavior that might be harmful to themselves, co-workers, the Company, or that might be viewed unfavorably by current or potential customers or by the public at large. Employee conduct reflects on the Company. Employees are, consequently, encouraged to observe the highest standards of professionalism at all times.

Types of behavior and conduct that the Company considers inappropriate include, but are not limited to, the following:

- Falsifying employment or other Company records;
- Violating the Company's Anti-Harassment Policy;
- Violating applicable laws and regulations including those that are voluntarily adhered to as policy of the Company;
- Violating security or safety rules or failing to observe safety rules or the Company's safety practices; failing to wear required safety equipment; tampering with the Company's equipment or safety equipment;
- Soliciting gratuities from customers or clients;
- Exhibiting excessive or unexcused absenteeism or tardiness;
- Possessing firearms, weapons, or explosives on Company property without authorization, in violation of Company policy or while on duty;

- Using Company property and supplies, particularly for personal purposes in an excessive, unnecessary, or unauthorized way;
- Engaging in criminal conduct or acts of violence, or making threats of violence toward anyone on Company premises or when representing the Company; fighting or provoking a fight on Company property, or negligent damage of property;
- Reporting to work under the influence of drugs or alcohol, and/or illegally manufacturing, possessing, using, selling, distributing, or transporting drugs;
- Committing theft or unauthorized possession of Company property or the property of fellow employees; possessing or removing any Company property, including documents, from the premises without prior permission from management; using Company equipment or property for personal reasons without proper authorization; using Company equipment for profit;
- Giving confidential or proprietary Company information to competitors or other organizations, or to unauthorized Company employees; working for a competing business while an employee of the Company; breaching confidentiality of personnel information;
- Using obscene, abusive, or threatening language or gestures;
- Acting in an insubordinate manner;
- Spreading malicious gossip and/or rumors; engaging in behavior which creates discord and lack of harmony; interfering with another employee on the job; restricting work output or encouraging others to do the same;
- Sleeping or loitering during working hours;
- Soliciting during working hours and/or in work areas; selling merchandise or collecting funds of any kind for charities or others without authorization during business hours, or at a time or place that interferes with the work of another employee on Company premises;
- Posting, removing, or altering notices on any bulletin board on Company property without the permission of an officer of the Company or in violation of procedures related to same;
- Smoking in restricted areas or at non-designated times, in accordance with Company policy.

Should an employee's performance, work habits, overall attitude, conduct, or demeanor become unsatisfactory based on violations either of the above or of any other Company policies, rules, or regulations, the employee will be subject to disciplinary action, up to and including termination.

Before or during imposition of any discipline, employees may be given an opportunity to relate their version of the incident or problem at issue and provide any explanation or justification they consider relevant.

PERSONAL PHONE CALLS AND PERSONAL BUSINESS

During business hours, you are requested to keep personal calls, including personal cell phone calls, to an absolute minimum. If you need to leave the worksite to conduct personal business, you must first obtain permission from your immediate supervisor. This will allow us to make modifications to the work schedule if necessary and will keep us aware of your activities during the day. Personal visits of friends and family members to the worksite are discouraged.

USE OF COMMUNICATION SYSTEMS

It is the intent of the Company to provide the communication systems necessary for the conduct of its business. Employees are expected to adhere to proper use of all communication systems. These include, but are not limited to, the telephone, electronic mail (email), cell phone, facsimile, Internet, computer terminals and other software. Employees are permitted use of Company property and must comply with Company policies and procedures regarding its use.

The communication systems are owned and operated by the Company and are to be used for the business of the Company. Employees should have no expectation of privacy of any correspondence, messages, or information in the systems, regardless of the content or purpose of the same.

COMPANY PROPERTY

In an effort to ensure the safety and welfare of employees and invitees, the Company reserves the right, on reasonable suspicion that Company policy is being violated, to conduct searches or inspections which include, but is not limited to, employee's work area, desks, and any other property located on Company premises or worksites. Entry on Company premises or worksites constitutes consent to searches or inspections.

WHISTLE BLOWER POLICY AND PROCEDURE

As a Company of repute, Deki is committed to conducting its business by adopting the highest standards of professional integrity and ethical behavior. The Whistle Blower Policy is a channel to reinforce a robust implementation of the Company's Code of Conduct. Through this Policy, the Company seeks to provide a procedure for all the employees of Deki Electronics Limited as well as its Patrons to disclose any unethical and improper practice taking place in the Company for appropriate action and reporting.

The Company provides necessary safeguards to all Whistle Blowers for making Protected Disclosure in good faith, in all the areas mentioned in the Code of Conduct such as Business with Integrity, Responsible Corporate Citizenship, Illegal and Unfair Labor Practices, Trade Practices and Other Laws.

PROCEDURE:

Purpose:

To provide a secure environment to employees and its patrons for responsible reporting of violation of Deki code of conduct by any employee.

When to Report:

Disclosure should be made at the earliest possible instance, upon noticing an irregularity or breach of code.

How to Report:

Inform the Vice President or his representative of an irregularity or breach of code either through phone or E-mail/writing.

Where to Report:

All disclosures must be made to the Vice President or his representatives. Multiple avenues of reporting are available to you.

1. Disclosure via phone: 0120-2585457/58
2. Disclosure via email : at shanker@dekielectronics.com or rajesh@dekielectronics.com

Anonymous Reporting:

Even through you may make the disclosure; we encourage you to share your identity. The representative will ensure complete confidentiality of your identity.

Investigation Process:

Investigation will be completed by the Vice President or his appointed authority generally within 45 days of disclosure.

Confidentiality:

All disclosures will be treated with utmost confidentiality. Identity of the whistle blower and investigation subject will be kept confidential and shall only be disclosed to the investigating team for facilitation of proper investigation.

Protection to Whistle Blower:

Company assures protection against any discrimination or unfair treatment to the whistleblower making the disclosure.

WAIVERS

Any waiver of any provision of this Code of Conduct for any director or employee must be placed for approval before the Company's Board of Directors/ appropriate authority.


Vinod Sharma
Managing Director

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