



SunSource Energy Private Limited

Employee Policy Manual

Document No – SSEPL-HR-01

Revision No - 01

Title – Employee Code of Conduct

Code of Conduct

Policy



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1. Objective

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The Employee Code of Conduct outlines standards of personal and professional conduct that all employees must strive to uphold to maintain a working environment that is productive, positive, enjoyable, safe and free from harassment and discrimination.

2. Scope

The policy applies to:

- Employees of the company & its subsidiaries in India and outside
- Employees include Board of Directors, Permanent, trainees, contract and part time employees

3. Roles & Responsibilities

The general supervision and administration of the policy is the responsibility of the Head of HR at SunSource Energy & S3 Energy.

4. Policy


I. Respect for Individual

At SunSource, we strive to provide a work environment free of discrimination and harassment.

- We must also ensure that we never verbally or physically mistreat others or engage in offensive behavior, and we should not tolerate those who do. This includes harassing, bullying, abusive or intimidating treatment, inappropriate language or gestures, disorderly conduct, violence and any other conduct that interferes with a co-worker's ability to do his or her job.
- To work effectively, all of us need a healthy and safe work environment. All forms of substance abuse as well as the use or distribution of drugs and alcohol while at work is prohibited.
- Unless required as part of your role (for instance for security personnel where deemed necessary), possession and / or use of weapons / firearms or ammunition while on business of the Company is prohibited

II. Honest & Ethical Conduct

- Compliance with the Law

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The employees must exhibit their total submission to the limits of law in drawing up the business policies, including strict adherence to and monitoring of legal compliances at all levels.

- Fair and Transparent Conduct

The employees are expected to act in accordance with the highest standards of personal and professional integrity, independence, honesty and ethical conduct including use of utmost care and sound judgment in good faith while making business decisions.

- Business must be done by lawful, ethical and fair means and must bring about a reputation of ethical business dealings by the Company. There shall be no room for discrimination, harassment, retaliation or any form of corruption and/or conduct that is likely to bring discredit to the Company. Every employee of SunSource Energy & S3 Energy shall ensure, at all times, the integrity of data or information furnished by him / her to the company

III. Gifts & Donation


- We should never offer, directly or indirectly, any form of gift, entertainment or anything of value to any government official, commercial partners including customers or their representatives to:
 - Obtain or retain business;
 - Influence business decisions; or
 - Secure an unfair advantage

This includes bribes, kickbacks and facilitation payments.

- No employee shall make, authorize, abet or collude in an improper payment, unlawful commission or bribing.
- The No Gift Policy shall form a part of the code of conduct and the employees are expected to adhere to the same.

IV. Concurrent Employment

- An employee shall not, without the requisite official 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.

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- The above shall not apply to the following (whether for remuneration or otherwise):
 - Nominations to the boards of SunSource Energy & S3 Energy companies, joint ventures or associate companies.
 - Nominations / memberships in government committees / bodies or organizations
 - Exceptional circumstances, as determined by the competent authority.

V. Conflict of Interest

- An employee of SunSource Energy & S3 Energy 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 shall not engage in any business, relationship or activity which might conflict with the interest the company.
- A conflict of interest, actual or potential, may arise where, directly or indirectly in the following situations:
 - a) An employee of SunSource Energy & S3 Energy 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 best interest cannot be exercised.
- The main areas of such actual or potential conflicts of interest shall include the following:
 - a) An employee 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, where the employee 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 concerned 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 SunSource Energy & S3 Energy.
- 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

VI. Employment of Relative

- Relatives will not be hired or be permitted to be transferred into departments/Teams in which a relative is currently employed, when the hiring/transfer will result in or has the potential to result in a conflict of interest/influence. In all cases where relatives are being hired or recommended to be hired, the concerned parties are mandatorily required to make disclosures to the HR team. The following are examples of conflict situations:
 - a) direct or indirect supervisory responsibility;
 - b) direct or secondary involvement in processes which involve decision making in situations such as hiring, promotion, salary and leave arrangements of a relative;

- c) direct or indirect involvement in situations which would or potentially could create a risk in internal control, accounting or labor relations practices;
- d) access to confidential information pertaining to a relative or a relative’s employment.
- Relatives are defined as spouse, son, daughter, mother, father, brother, sister, grand-parent or child, step-parent or child, step-sister, step- brother, in-laws, aunt, uncle, nephew, niece, first cousin, significant other, domestic partner or any other relationship that would present a conflict of interest as determined by the Company.
- Consensual sexual/romantic relationships between employees working in the same department are discouraged. In case of such relationships and in case of marital relationships arising out of romantic involvement between employees, it will be at the management’s discretion to either change the reporting chain/Department or take any other action that it deems fit. In all cases employees are required to make disclosures to the management team through HR.

VII. Securities transactions & confidential information

- An employee of SunSource Energy & S3 Energy 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 SunSource Energy & S3 Energy 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 SunSource Energy & S3 Energy, 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.

- Announcement of new brands
- Asset revaluations.
- Investment decisions / plans.
- Restructuring plans.
- Major supply and delivery agreements.
- Raising of finances.
- Any other price sensitive information which can potentially have impact on company’s share prices
- An employee of a SunSource Energy & S3 Energy 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.


VIII. Personal Conduct

- Employees should not be under the influence of alcohol or other substances while they are at work or at work functions.
- There may be company-sponsored events where management approves the serving of alcoholic beverages. However, under all such cases, excessive drinking, intoxication and misbehavior is prohibited and will be dealt with severely.
- Possession, use or trafficking in illegal drugs on the premises is not permitted. SunSource Energy & S3 Energy premises include but are not limited to all buildings, vehicles, car parks, meeting rooms, and open spaces.
- SunSource Energy & S3 Energy expects the full attention of its employees while they are working. Although employees may occasionally have to take care of personal matters during the workday, employees should try to conduct such personal business either before or after the workday or during breaks or meal periods. Regardless of when any personal call is made, it should be kept short.
- Employees are expected to not engage in Bullying. Bullying is unreasonable behavior that is directed against an individual or group by another individual or group and is derived from the misuse of power. This may include:
 - verbal abuse, shouting

- excluding or isolating behavior
- deliberately withholding information vital for effective work performance
- giving employees impossible assignments
- physical abuse
- Employees are advised to abstain from conduct that incites hatred against, serious contempt for, or revulsion or severe ridicule against a person or group on the grounds of racial identification or religious belief or activity.
- Employees may not, knowingly, make false or misleading statements regarding its competitors or the products of its competitors, customers or suppliers.
- SunSource Energy & S3 Energy is committed to a gender friendly workplace and it seeks to prevent/stop/redress sexual harassment at the workplace and institute good employment practices. Employees shall be bound by the Policy against sexual harassment (POSH).
- It is expected that all employees in SunSource Energy & S3 Energy treat people (within and outside the company) with respect and in a manner that their self-esteem and dignity are maintained at all times.
- Employees are expected to be punctual and regular in their attendance.
- SunSource Energy & S3 Energy is well-recognized and respected and projects a particular image to our clients. Employees must therefore ensure that their appearance is neat, clean and appropriate for their particular area of work. A high standard of personal hygiene is expected at all times.
- Favoritism or making business decisions based on emotions, allegiances or friendships rather than the best interests of the Company is prohibited.
- Employees should not participate in financial transactions with other employees. Employees are prohibited from lending money to other employees with interest. This policy does not prohibit occasional lending of nominal value between employees, as long as the interactions are voluntary. In these cases, the employees participating in the transaction are required to send an email to their respective Supervisors recording the transaction.

IX. Health, Safety and Environment

- Employees are expected to adhere to health and safety norms laid down by the company from time to time.
- We should conduct business in environmentally and socially responsible ways, and contribute positively to the local communities in which we operate.
 - We believes in contributing positively, directly or indirectly, to the local communities in which we operate
 - SunSource Energy & S3 Energy believes in exercising our duty of care through taking steps towards fostering a positive workplace health and safety culture
 - SunSource Energy & S3 Energy believes in the priority of health, safety and environmental (HSE) responsibilities and is committed to continuously improving our HSE performance and managing HSE risks associated with our activities, products and services
- We must understand and appreciate that HSE compliance is more than following rules. All employees should work towards minimizing the occurrence of hazardous situations by embracing and practicing behavioral observations and positive intervention.
 - We must always
 - Conform to Group HSE Policies, standards and practices
 - Maintain general good housekeeping and pollution prevention practices
 - Be responsible for our safety, health and welfare while at work through the use of suitable appliances or personal protective equipment in compliance with applicable requirements and guidelines
 - Be responsible for stopping any unsafe HSE act and / or conditions; or refuse to work in an unsafe work environment which may lead to imminent risk to ourselves and / or others
 - Feedback on HSE incidents and non-conformance in accordance to HSE Management System and requirements
 - We must never

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- Commence work in any form when we may be incapacitated by use of alcohol or drugs (whether illegal, legal or prescribed)
- Interfere or misuse any appliance, personal protective equipment or other means provided for securing safety, health and welfare of persons at work
- Work in an unsafe work environment or unsafe manner which may lead to imminent risk to ourselves or others

X. Protecting Company Assets

- The assets of SunSource Energy & S3 Energy shall not be misused by any employee; 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.

XI. Protection of Trade Secrets and Confidential Information

- SunSource Energy & S3 Energy’s trade secrets may consist of any formula, design, device or information that is used in our business and that gives us an opportunity to obtain an advantage over our competitors. They can also include business research, new product plans, strategic objectives, any type of marketing or sales material or information, any unpublished financial or pricing information, employee, customer and vendor lists, and information regarding customer requirements, preferences, business habits and plans.
- Employee obligations with respect to SunSource Energy & S3 Energy’s trade secrets and other confidential information are:
 - Not to disclose this information to other employees of SunSource Energy & S3 Energy or third parties except on a “need to know” or “need to use” basis and, in those instances, with confidentiality


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designations and other data protection mechanisms such as password protection or encryption, as appropriate; and not to otherwise disclose this information.

- Not to engage third parties to handle this information without an appropriate review of the security and information technology controls of the third party.
- Not to post or discuss this information on publicly available websites or social media sites.
- Not to use this information for your own benefit or the unauthorized benefit of persons outside of SunSource Energy & S3 Energy
- To take all other reasonable measures to protect the company’s trade secrets and confidential information.


XII. External Communication

- **Communicating for the Company:** The Company has a strong ‘no comments’ policy for rumors, which includes accepting or denying the same. In case any employee comes across any rumor about the Company, they are duty bound to bring it to attention of the authorized person (Person(s) authorized to make statements on behalf of the Company, presently, the CEO, President or Head Marketing) and should not engage in any communication themselves. Remember NEVER to disclose non- public information of the Company and be aware that taking public positions that are counter to the Company’s interests might cause conflict. Our expectations for Employee’ Personal Behavior is to recognize that there is a big difference in speaking “on behalf of the Company” and speaking “about” the Company. While the Company has high tolerance levels when Employees talk about the Company in a manner which enhances the reputation of the Company, the Company has a ZERO tolerance levels if any Employee other than those who are so authorized speaks “on behalf of the Company.”
- **Communication with Media Houses/ Press:** No employee of the Company, barring those employees who are so authorized, will speak to any Media House/ Press on any matter pertaining to the company. Any statement or press release given by the authorized representative will have to be placed

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before the authorized person(s). All requests from the media should be recorded accurately and passed on immediately to the authorized person(s). This includes formal requests for interviews as well as enquiries, and includes all media – TV/Radio, newspapers, magazines, local/national and trade media and internet sites.


- **Speaking at seminars and similar events:** The Company will encourage employees of the Company to accept invitations to speak at events or participate at events which would help in enhancing knowledge for this would add to the profile of the Company and the employee. The employees are however required to get pre-authorization from the authorized person(s) and are barred from speaking about the Company on issues which are not in public domain. Further, the employee shall be required to have the content of such speech pre-approved by the respective departmental head, and the authorized person(s).
- **E-mails:** No employee shall at any point of time and under any circumstances, send any official e-mail to his/her personal e-mail ID or use any personal laptop/ computer on the Company network to do any Company work.
- **Intellectual Property:** Employees are requested to report any incident pertaining to the misuse of intellectual property of the Company to the authorized person(s) as stated above. In the event any Employee is asked to write any article or make any presentation, such Employee shall be required to run the presentation/ article through the authorized person(s) as stated above along with the legal department of the Company. The Employee is duty bound to disclose to the management team and legal department about the source of information for the legal department to determine whether or not the article/ presentation infringes or is likely to infringe any intellectual property of any third party. The Company expressly states that it shall not be liable for any actions/suits/claims/ etc. that may be brought against it for any actions of an Employee of the Company which infringes upon the intellectual property rights of any third party and all liability shall be borne by the Employee responsible for causing such infringement.

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- **Personal Interaction**. Online, employee and business personnel are likely to intersect. The Company respects the free speech rights of all of its employees, but the employee must remember that customers, colleagues and supervisors often have access to the online content you post. Keep this in mind when publishing information online that can be seen by more than friends and family, and know that information originally intended just for friends and family can be forwarded/passed on. Employees’ personal interaction over the internet can also reflect upon the Company.
- **Social Media Policy**
 - In today’s era, the internet has become a commonly used medium for promotion, marketing and recognition, as it offers a platform for global networking. Therefore, the online presence of any company or individual or any other entity has become important.
 - These diverse communications technologies have given business people a whole host of ways in which they can communicate. In addition to writing letters, making phone calls and meeting face-to-face, today's business people can send text messages, leave Facebook posts, send instant messages or email their recipients, just to name a few. Thus, employers need to draft policies that dictate how these communication media should be used.
 - Our Company being one of the best in the business of providing solar energy is bound to be mentioned and discussed on several of the social media platforms. We recognize the critical importance of participating in these online discussions and blogs and are committed in ensuring that we are actively involved in online social media in a responsible manner which does not offend Company’s social media policy.
 - The Company encourages all of its employees to explore and engage in social media communities at a level which is comfortable. The best advice is to approach online world in the same way we do the physical one – by using sound judgment and common sense, by adhering to

the Company's values, and by following the Code of Business Conduct and all other applicable policies.

- The Company respects the rights of its employees to use blogs and other social media tools not only as a form of self-expression, but also as a means to further the Company's business. It is important that all employees are aware of the implications of engaging in various forms of social media and online conversations that refer to the Company and/or the employee's relationship with the Company and its brands, and that the employees recognize when the Company might be held responsible for their behavior.
- The Online Social Media Principles is intended to outline how employees should conduct themselves in the online social media space and to guide their participation in this area. For various Social Media Policies, along with the communication policy already mentioned above, we have elaborated on some of the dos and don'ts below:
 - **Identity.** Employees are encouraged to keep their personal identity different from official identity. Under no circumstance an employee should create a social media account using his/her official email id. Moreover, an employee should clearly mention in the profile description that the 'views are personal'.
 - **Responsibility of Actions.** Anything the employee circulates on any online platform or the internet that can potentially tarnish the Company's image will ultimately be the responsibility of the employee circulating the same. Company encourages employees to participate in the online space, but request them to do so properly, exercising sound judgment and common sense. Employees should discourage participating in discussions that are sensitive in nature and are against any specific caste, creed, gender or religion.
 - **Negative Posts.** Employees may come across negative or disparaging posts about the Company or its brands, or see third

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parties trying to spark negative conversations. Pass the post(s) along to our authorized person(s), who are trained to address such comments. The Employees are also forbidden from making any negative posts about the company, during the course of their employment or upon termination of their employment with the Company. Any issue that any Employee may have with the Company has to be dealt with and addressed to within the framework that has been adopted by the Company for dealing with such matters.

XIII. Reporting Concerns

- Every employee of SunSource Energy & S3 Energy shall promptly report to the management/HR, when she / he becomes aware of any actual or possible violation of the Code or an event of misconduct, act of misdemeanor or act not in the company’s interest.
- Any SunSource Energy & S3 Energy employee can choose to make a protected disclosure under the whistleblower policy of the company.
- The company shall ensure protection to the whistleblower and any attempts to intimidate him/her would be treated as a violation of the Code.

XIV. Penalty for Breach

- Sanctions for breach of this Code shall be determined by :
 - The CEO, President and COO & Head-HR.
 - Sanctions may include disciplinary action, termination as well as other remedies, deemed appropriate.

XV. Exceptions to the Policy

- Any exceptions to the policy require the approval of the CEO, President and COO & Head-HR.

5. Procedure

If there is evidence of deterioration of performance, attendance, conduct, or disregard of a standard of behavior by the employee, corrective counselling may be initiated. However, corrective counselling is not a prerequisite to disciplinary action or involuntary termination of employment. Employment may be terminated at any time with or without cause in event of breach of code of conduct.

6. Revision History

Revision No	Revision Summary	Effective Date
00	Policy Document	February 01, 2019
01	Communication Policy Revision	June 10, 2019

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