

# CODE OF CONDUCT

## FOR PARTNERS & SENIOR MANAGEMENT



GLOBAL  
ACCOUNTING FIRM

### Applicability

This 'Code of Conduct' shall be applicable to all Board Members and also to the Senior Management Staff immediately one level below the Board Members.

### Conduct of Business

The Board Members and the Senior Management team shall conduct the Company's business in an efficient and transparent manner and in meeting its obligations to shareholders and other stakeholders.

The Board Members and the Senior Management team shall not be involved in any activity that would have any adverse effect on the objectives of the company or against national interest. The corporate objectives to be pursued shall be to sustain the competitive edge of the company and not to indulge in any activity, which is detrimental to the society at large.

### Quality Services

The Board Members and the Senior Management team shall be committed to rendering services of the highest quality standard as per the requirements of the clients to ensure their total satisfaction. The quality standards shall be in consonance with national/international standards.

### Competition

The Board as well as the Senior Management team shall ensure that the Company's services are made available to the clients freely and shall not make false/misleading statements about the competitors' services or indulge in any unfair trade practices.

### Wealth Creation

The Board Members and the Senior Management team shall constantly strive to enhance the net wealth to the shareholders and shall strictly comply with all regulations and laws that govern shareholders' rights.

### Conflict of Interest

The Board Members and the Senior Management team shall not engage in any activity or enter into any pecuniary relationship, which might result in conflict of interest, either directly or indirectly.

The Board Members and the Senior Management team shall not derive any personal benefit by influencing any decision relating to any transaction or involve in any dealing with the company's promoters, its management or its subsidiaries, suppliers, shareholders and other stakeholders which, in the judgment of the Board, may affect the independence of judgment of the Director concerned

### Protecting Company's Assets

The Directors and the Senior Management team shall not indulge in or encourage any activity, which would result in misuse of the Company's tangible and intangible assets.

### Outside Activities

All Board Members as well as the Senior Management team shall be free to pursue any kind of civil/political activities and can become Members or Office Bearers of any Trade Organization so long as it does not adversely affect or is detrimental to the business interests of the Company.

### Confidentiality

The Directors and the Senior Management team shall ensure and take all reasonable measures to protect the confidentiality of non-public information about the Company, its business, clientele and other materially significant information obtained or created in connection with any activities with the Company and to prevent the unauthorized disclosure of such information unless required by applicable laws or regulations or legal or regulatory processes.

### Non-abuse of official position

All employees and directors of the company are in a position of trust. Each one of them has a responsibility to make decisions on merits and with due care. They must not abuse their official position to obtain any undue benefit for themselves, close relatives or for someone else, in cash or in kind. Similarly, they should not use their official position to influence any person to enter into financial or other arrangements with them, close relatives or with any one else, at the cost of the Company.

### Consumption of Intoxicating drinks and drugs

The Directors and employees shall strictly abide by any law relating to liquor, narcotics, or any other form of intoxicating drugs in force in any particular locality or nation they may happen to be for the time being.

During the course of their duty, not to be under the influence of any liquor, narcotics, or any other form of intoxicating drugs and shall take due care that the performance of their duties at any time is not affected in any way by the influence of such drinks or drugs.

Not to appear in a public place in a state of intoxication.

### High Level of Ethical Standards

In their personal and professional life, all employees and directors of the company shall ensure high level of ethical standards and will not be involved in any incident of moral turpitude.

### Sexual Harassment

JSL Global Doha is committed to institute good employment practices and provide equal opportunities for men and women for growth and development and prevent, stop, redress, condemn sexual harassment of any form. It demands, demonstrates and promotes respectful behaviour with all employees at all levels.

### Variation of the Code and Waivers

The Code shall be reviewed from time to time for updating thereof. Any variation in the Code or any waivers from the provisions of the Code shall be approved by the Board Directors of the Company and shall be disclosed on the Company's website.


### Violation of the Code

The Board of Directors of the Company shall have the powers to take necessary action in case of any violation of the code.

### Adoption and Commencement

This Code of Conduct was adopted by the Board of Directors by its Resolution dated December 13, 2012 and subsequently amended vide Board Resolution dated February 21, 2011 and shall be deemed to have come into force with effect from 1st April, 2006 and amendments with effect from February

  
Mansoor Mohammed I A Ghanim  
Managing Director

  
Nishith Kothari  
General Manager

  
Jigar Shah  
Director (Project and 3PL)