



**MITS Global Consulting Private Limited**

# **BUSINESS ETHICS POLICY**

<b>Version</b>	<b>Date</b>	<b>Prepared by</b>	<b>Reviewed by</b>	<b>Approved By</b>
1.0	04.12.2024	Madhu Jain	Sangeeta Mungapatil	Sandeep Dhurka

**Policy Statement:**

MITIS conducts business with integrity, fairness, and transparency. This Business Ethics Policy outlines the ethical principles and expectations that guide our actions, decisions, and interactions with stakeholders.

**Scope:**

This policy applies to employees, clients, and all third-party suppliers/ vendors.

**Compliance with Laws:**

- Labor laws and human rights regulations
- Anti-corruption and anti-bribery laws
- Data privacy and protection laws
- Other applicable laws and regulations

**Commitments:**

We are committed to

- Maintaining a zero-tolerance policy toward bribery, corruption, fraud, and any form of unethical or illegal behavior.
- Preventing and addressing conflicts of interest, ensuring that personal interests do not interfere with professional responsibilities or company decision-making.
- Protecting sensitive information and upholding data privacy by ensuring strict information security practices,
- Providing regular ethics training and communication, ensuring all employees understand their responsibilities and the standards expected of them.
- Respecting and protecting human rights, including the prohibition of child labor, forced labor, and discrimination in the workplace.

We will monitor our progress by achieving and tracking the following targets by the end of every year, compared to the baseline year 2025:

- 100% of employees trained on Anti Bribery and Corruption, Anti-fraud & Money laundering awareness by FY 2026.
- 100% of employees trained on conflict-of-interest policies by FY 2026.
- Ensure 100% of new employees complete business ethics induction training.
- Prepare Business Ethics Report to record number of incidents or complaints.

**Roles and Responsibility:**

The HR Team, in collaboration with an external legal consultant, is responsible for developing policies and proposing annual objectives to the Board of Directors. They also identify best practices and tools to support the company in achieving its ethical commitments and strategic targets.

**Records and Documentation:**

- Training Records

- Records of any other complaints received
- Implementation records

**Policy Review:**

We ensure that there is constant monitoring to prevent violations of this policy. This policy is subject to review and updated every six months and all changes will be communicated to the relevant stakeholders. For any questions and feedback, contact the HR or Management Team.

**Reporting:**

We will monitor and report on the overall progress of the effective implementation of the policy.

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