



CODE OF BUSINESS CONDUCT

Redington (may be referred as Company) believes in transparency, ethical conduct, honesty & integrity while transacting with all stakeholders in accomplishing its vision and objectives. This document details/specifies essential requirements which all our employees are expected to be compliant with at all times in all dealings with any of our partners, Government or any outside agencies and within the Company.

The code of conduct shall be binding for all employees (may be referred as You) in its dealings with inside or outside the organization. All concerned employees are also expected to abide by the vendor code of conduct for the brands represented by them.

WORKPLACE CONDUCT

- Safe and Healthy Work Environment

Redington is committed to provide each and every employee a safe environment to work and have a zero tolerance approach towards any kind of workplace violence. We expect all employees to treat their colleagues with dignity, professionalism and respect. Each employee must follow all safety guidelines as may be prescribed and report any unsafe conditions or accidents. Any acts or threats of violence towards another person or Company property must be reported promptly to the Human Resources/ Administration department immediately.

- Tobacco, Alcohol & Drug Free Workplace

Redington adheres to Tobacco, Alcohol and Drug Free Workplace policy, which aims to promote health, safety and well-being of our employees. Employees are expected to abide by the same at all times in the workplace. In case an employee would want to smoke cigarettes, he/she should only use designated outdoor areas that Company or building management, at its discretion, has earmarked as such.

Employees are strictly prohibited from consuming, carrying or distributing drug, alcohol or any intoxicant substance during working hours and at any time in the Company premises or outside the Company at all times while conducting business on behalf of the Company.

All Employees working or visiting any client locations must strictly follow the client's established policies pertaining to the above said subject. In case of any violation of the above, the employee shall be subject to strict disciplinary action including termination of the employment.

- Dress Code

We expect the employees to be in formals while attending office or any meetings wherein the employee is representing the Company. Smart casuals are allowed only during last day of the week e.g. Thursday where the weekend is on Friday and Saturday.

- Fair Employment Practices and Sexual Harassment

Redington practices equal opportunity & a zero tolerance approach on any kind of discrimination whether engaged by an employee or other person with whom the employee may contact as part of their employment. The Company does not tolerate discrimination based on any considerations and all employees are treated the same with respect to their qualification, experience, nationality etc. All business decisions shall be taken on merit and shall not be due to any other considerations including race, religion, nationality, gender etc.

It is expected that all employees shall abide by the company policy as notified from time to time & accordingly make decisions pertaining to recruitment, employment, promotion, transfer, pay and benefits, training, lay-off and termination.

- No Harassment (verbal/ physical)/Misbehaviour/Discrimination

Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated, where a reasonable person would anticipate that reaction in the circumstances or creates an intimidating, hostile, or offensive work environment.

Employees should not engage in any form of harassment in the workplace, including verbal harassment (epithets, derogatory statements, slurs), physical harassment (hitting, pushing or other aggressive physical contact), visual harassment (posters, cartoons, drawings, pornographic material) and any kind of sexual harassment.

Any violation of the same shall be reported to the Human resources department. Any employee found to be in violation or offending shall be subject to necessary disciplinary proceedings including termination of employment.

CONFIDENTIALITY

Confidential information shall include all such information relating to the vendors, customers, markets, business strategies, financials, policies and procedures and all such other information as may be deemed to be confidential or shall be treated as confidential by any ordinary person.

You must safeguard confidential information of the Company by not transferring, publishing, using, or disclosing it to any party other than as may be required in the ordinary course of business. Materials that contain confidential information or that are protected by privacy standards should be stored securely and shared only internally with those employees with a need to know. You shall not without express authorization provide any information designated as confidential to any third parties. You shall also not disclose any confidential information which you may be privy to due to your employment with the Company after your separation from the Company for a period of 3 years.

In case of any violation, you shall be held responsible and disciplinary action shall be taken against you.

USE OF INFORMATION TECHNOLOGY AND SOCIAL MEDIA

Our information technology systems are essential business tools for our work. As an employee you have the responsibility to use the same appropriately within the law. The usage of the system or information network should be in accordance with good business practice and in accordance with interest of the Company.

While posting any posts or update on the social media, you should refrain from posting any posts which are illegal, abusive, defame or not in accordance with the law. Also you should refrain from posting any comments on the social media with respect to the Company to give an impression to the outside world that opinions expressed by you are the opinion of the Company.

You shall also ensure that any of your personal posts in the social media does not create any risks to the Company or to the group. You shall refrain from posting any issues/matters on social media on any religious, political or local customs/practices. In case of any violation of this, the Company shall take appropriate disciplinary action against the employee and the employee shall be personally responsible for such comments made.

CONFLICT OF INTEREST

The term “conflict of interest” describes any circumstance that could cast doubt on your ability to act with total objectivity with regard to the business. A conflict of interest occurs when your personal, financial, or family interests or relationships interfere, or appear to interfere, with your ability to be objective and act in the best interest of the Company. Employees are expected to have complete attention towards their work.

The Company wants its employees to be free from any such conflict of interest. You shall always keep the Company’s interest in mind and your activities outside of work should never interfere with your ability to make the right decisions. You also must avoid situations that conflict or even appear to conflict with the best interest of the Company. In case of any such conflict of interest, the concerned employee shall inform the Company or provide a declaration letter. The Company shall have the right to seek a declaration from the employee at such intervals as it may deem appropriate.

ACCURATE FINANCIAL RECORDS AND BOOK KEEPING

Our stakeholders rely on our financials for making an informed decision with respect to investment or business decisions. We maintain our accounts accurately which reflect the current state of affairs of the Company and also in accordance with the document retention policy & applicable laws. No Employee may make false, misleading, incomplete, inaccurate or artificial entries in the books, records or accounts of the company nor establish or maintain any undisclosed or unrecorded fund or asset for any purpose.

You shall not engage in any activities wherein the records are posted without proper authorization or against our accounting policy.

PROTECTION OF COMPANY ASSETS

It shall be your duty to ensure that the Company's assets and information are always protected. All the Company assets and information shall be used only for business purposes. Each Party has a responsibility to use and maintain the Company assets with care and to guard against waste and abuse.

The Company's assets must only be used for the business-related aspects or for any other use as duly notified and authorized by the Company. In the event that you undertake or execute any modification, alteration and/or up gradation of asset of the Company, such modified, altered, upgraded asset shall also belong exclusively to the Company. Upon the termination of employment or service engagement with the Company, you must hand over all the Company assets in its possession to the immediate Reporting Manager or any such person as may be designated by the Company from time to time for this purpose. The Company further retains the absolute right to restrict, monitor, modify and delegate the use of its assets by any Party. The Party will be solely responsible for the use of all assets of the Company that have been entrusted to its custody by the Company and no acts of commission or omission on behalf of the Company shall constitute a waiver of such responsibility or liability on its part.

During the course of employment or work related engagement with the Company, you could have access to a wide variety of data and documents, some of which may have been created by you alone or as a part of a team. The Company shall at all times retain absolute ownership of all such content, documents and/or data and you shall not copy, transmit, remove or alter such data except in pursuance of its official duties.

You could have access to Company or customer or partner-provided messaging systems and tools that are provided to facilitate business. These systems and tools include e-mail, fax, instant messaging, telephones, voice-mail, mobile devices, and file sharing via Internet and internal networks. All information sent or received using such messaging systems is the property of specific Company or customer or partner, and may be monitored by them.

The tone and content of all messaging is expected to be business-like and to reflect well on the Company.

DATA PRIVACY

You shall ensure that any data collected with respect to any individuals including our customers or end users shall be adequately protected and not disclosed without obtaining their consents. You shall also ensure that all applicable regulations in the country where you operate shall be complied with respect to any data protection or privacy regulations.

INTELLECTUAL PROPERTY RIGHTS

Redington respects the intellectual property rights of others and expects others to respect its intellectual property rights. You are responsible for protecting Redington's intellectual property rights. An important element of such protection is maintaining the confidentiality of Redington's trade secrets and proprietary information.

You must respect the intellectual property of Redington and not use or reproduce copyrighted software, documentation, or other materials without written permission. In the course of working with or for Redington, you must not use proprietary information, patented technology or copyrighted software, documentation, or other materials of third parties without authorization.

INSIDER TRADING

In case You possess any material, non-public information ("insider information"), You shall not trade in Redington's securities or securities of any other company to which such information pertains. You may not engage in any other action or take advantage of or pass on to others any material information known as an employee of Redington until it has been disclosed to the general public. These restrictions also apply to your spouses and family members. You are expected to familiarize yourself with these laws and consult qualified counsel for related advice.

ANTITRUST & COMPETITION LAWS

Redington is committed to do its business in a fair, transparent and ethical manner. We outperform our competitors in a fair and honest manner without use of any illegal or anti-competitive practices.

Antitrust or competition laws enable to protect competition in the market and the consumer receive its benefits. Any kind of violation of such laws including any unfair or deceptive practices shall have huge ramifications including heavy penalties and reputational risks for the Company.

You must ensure that the business is conducted in the fair and transparent manner and without indulging in any unfair trade practices or deceptive manner including price fixing with competitors, boycotts, rigging. These practices are against the public policy and also against Redington's values and principles.

You are also not supposed to provide any false or misleading information about the products which you represent in the market or making any untrue statements about the products or making any claims without any facts or substance.

EXPORT CONTROL LAWS

Redington is committed to comply with all applicable laws and regulations including any trade restriction or export control laws.

Employee shall note and understand that Redington deal with products, including hardware, software, technology, that may be subject to USA and other government export control regulations which restricts/regulates export/-re-export obligations.

It shall be understood that there are restrictions on products/services transactions with US government sanctioned parties – companies, firms or individuals named in the following:

1. Denied Parties List,
2. List of Specifically Designated Nationals,
3. Blocked Persons/Entity List,
4. Debarred Parties

We shall be fully compliant with such restrictions.

We shall not service, quote or accept an order for US/(Other countries) products from above mentioned parties.

We shall be cognizant of the fact that goods and technologies sold by us shall not be used for the purpose of nuclear weapons, explosive devices, chemical or biological weapons including key components of production of such weapons and for purpose of missiles systems, to deliver weapons of mass destruction.

BRIBERY & CORRUPTION

It is our policy to conduct all our business in an honest and ethical manner and in compliance with all relevant laws. We take a zero-tolerance approach to all matters involving dishonesty, bribery and corruption, lobbying with Government officials and are committed to act professionally, fairly and with integrity in all our business dealings including any Governmental entities and relationships wherever we operate and implementing and enforcing effective systems to counter dishonesty, bribery and corruption.

We must ensure that we are in compliance with all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate which includes, but is not limited to, the UAE Federal Law No. 3/1987 (as amended) (commonly known as the UAE Penal Code), the US Foreign Corrupt Practices Act, the UK Bribery Act 2010 and any and all other anti-corruption and anti-bribery laws, regulations and resolutions which are applicable, in force and relevant in any and all of the jurisdictions in which we operate.

GIFTS AND HOSPITALITY

Employees are expected to adhere to the gift policy and not to accept any gifts or hospitality which if disclosed in public shall act as an embarrassment. Employees must be aware that it is not prohibited to accept normal and appropriate hospitality (given and received) to or from third parties.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

1. As long as the gift is worth not more than USD 30/-.
2. It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
3. It complies with local law;
4. It is given in our name, not in your name;
5. It does not include cash or a cash equivalent (such as gift certificates or vouchers);
6. It is appropriate in the circumstances;
7. Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate
8. time;
9. It is given openly, not secretly; and
10. Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

REPORTING OF VIOLATIONS

You shall report any conduct, which you believe in good faith to be any actual or potential violation of this code of conduct.

Redington has an open door policy with regard to any such queries or report and shall be treated with utmost confidentiality. You may report any incident either to the Legal Counsel or shall send it to whistleblowerdesk@redingtongulf.com

Alternatively, you may contact the third party whistleblower hotline managed by Safecall as per the below contact details:

Whistle Blower Hotline:

Alternatively, you may also reach out to Safecall, an independent reporting service who would receive and process such feedback in a confidential manner.

Safecall provides a 24x7 service. You may report any wrongdoing by calling them on the numbers listed below. The concerned employee shall also contact the vendors's whistleblower hotline as well for the brands represented by them.

S.No	Country	Calling Number
1	UAE	8000 4413376
2	KSA	800 8442067
3	Qatar	8000 250
4	Kuwait	+44 191 516 7756
5	Bahrain	8000 4264
6	Oman	800 72323
7	Egypt	0800 000 0059
8	Lebanon	+44 191 516 7756
9	Kazakhstan	+44 191 516 7756
10	Jordan	+44 191 516 7756
11	India	000 800 4401 256
12	Nigeria	+44 191 516 7764
13	Ghana	+233 201437196
14	Ivory Coast	+44 191 516 7764
15	Senegal	+221 33 825 91 13
16	Morocco	+44 191 516 7764
17	Algeria	+44 191 516 7764
18	Cameroon	+44 191 516 7764
19	Kenya	+44 191 516 7764
20	Uganda	+44 191 516 7764
21	Tanzania	+44 191 516 7764
22	Rwanda	+44 191 516 7764
23	Ethiopia	+44 191 516 7764
24	South Africa	0800 990243