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|  | QUALITY SYSTEM MANUAL Business Ethics & Code of Conduct | | | DOCUMENT STATUS |
| | | | | Released |
| AS 9100 CLAUSE NO | ORG. ISSUE DATE | REV. NO. / REV. DATE | DOCUMENT NO. | PAGE NO. |
| 7.1.3 | 07-Jan-20125 | 00/ 07-Jan-2025 | Section-G-1 | 1 of 5 |


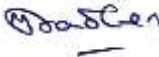
Business Ethics & Code of Conduct Policy

“Our organization is committed to comply with the highest standards of professionalism, promoting a culture of moral and ethical excellence with all stakeholders.”

The foundation of the policy is laid on


- **Encouraging individual respect & dignity**
- **Zero tolerance towards harassment**
- **Antibribery & anticorruption**
- **Prevention of child & forced labour.**
- **Ensuring privacy & confidentiality of stakeholders**

(This policy is applicable to all business stakeholders including suppliers & customers of Apsis Aerocom Limited.)

| Prepared by | Approved By |
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|  Mr. Chinmaya Rath MR & HoD – QMS |  Mr. Mihir Pradhan Chairman |

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| 7.1.3 | 07-Jan-20125 | 00/ 07-Jan-2025 | Section-G-1 | 2 of 5 |

- **Encouraging individual respect & dignity**

We are committed to fostering a work environment where all individuals are treated with respect and dignity. We believe that every employee, regardless of their role or background, deserves to be valued and heard.

Our commitments


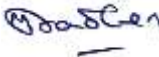
1. Open and respectful communication at all levels.
2. Differences in perspectives, backgrounds and experiences are to be valued and appreciated.
3. Discrimination, harassment or any form of disrespectful behaviour shall not be tolerated.
4. By promoting respect and dignity, we ensure that everyone feels safe, valued, and empowered to contribute their best.

- **Zero tolerance towards harassment**

The company shall operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one shall be victimized for making such a complaint.


Our commitment:

1. Harassment whether verbal, physical, visual or digital shall not be tolerated.
2. Any behaviour that undermines the dignity of an individual regardless of race, gender, religion, age, disability or any other protected characteristic is strictly prohibited.
3. All complaints shall be treated with seriousness, confidentiality and urgency.
4. Immediate and appropriate action will be taken against any individual found violating this policy.
5. Employees are encouraged to report concerns without fear of retaliation.

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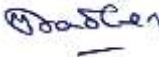
Our objective is to cultivate a secure and respectful environment that encourages growth and success for all

- **Antibribery & anticorruption**

Apsis Aerocom Limited is committed to conducting business with the highest standards of integrity and ethics. We have a zero-tolerance policy for bribery and corruption in any form.


Our commitments

1. Offering or accepting bribes or undue advantages is strictly prohibited.
2. Ensure adherence to the Prevention of Money Laundering Act and other applicable regulations.
3. Implement stringent KYC processes to verify the identity of clients, vendors, and partners. Maintain records of identification and transaction details.
4. Conduct thorough due diligence on suppliers, contractors, and business partners. Monitor and assess any high-risk entities or individuals.
5. Flag any unusual or inconsistent financial activity.
6. Promptly report any suspicious transactions to the Authorities as per legal requirements.
7. Maintain confidentiality while handling such reports.
8. Retain transaction records, audit trails, and KYC documentation for at least 5 years and ensure easy retrieval of records for audit or regulatory inspections. Promote awareness of potential money laundering risks.
9. Develop internal control mechanisms to prevent, detect, and mitigate money laundering risks. Periodically review and update policies based on risk assessments.
10. Violations of this policy will result in, including termination and legal penalties.
11. All financial transactions and records must be accurate, transparent, and in compliance with company policies.

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| 7.1.3 | 07-Jan-20125 | 00/ 07-Jan-2025 | Section-G-1 | 4 of 5 |

- **Prevention of child & forced labour**

Apsis Aerocom Limited is fully committed to ensuring ethical labour standards and protecting human rights. We have a strict zero-tolerance stance against the use of child labour or forced labour in any capacity.

Our commitments

1. Strictly adhere to the Child Labour (Prohibition and Regulation Act) and amendments as applicable.
2. We strictly prohibit the employment of individuals below the legal minimum working age as defined by applicable laws.
3. We do not tolerate any form of forced, bonded including human trafficking.
4. Vendor & Partner Compliance: All business partners, suppliers, and contractors are required to adhere to these principles and ensure compliance throughout their supply chains.
5. Monitoring & Audits: Regular audits and compliance checks are conducted to verify adherence to labour laws and ethical standards.
6. Employees and partners are encouraged to report any violations through confidential channels without fear of retaliation.


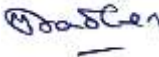
- **Ensure privacy & confidentiality of stakeholders.**

Our organization recognizes the importance of safeguarding the privacy and confidentiality of all stakeholders, including employees, clients, vendors and business partners. We are committed to protect sensitive information and maintaining trust through responsible data handling practices.

Our commitments


Strict Confidentiality:

1. All sensitive and proprietary information is handled with the highest level of care.
2. Disclosure of confidential information is only permitted when authorized or legally required.

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Compliance with Privacy Laws:

1. We adhere to all relevant data protection and privacy laws to safeguard stakeholder information

Controlled Access:

1. Access to confidential data is limited to authorized personnel.
2. Systems are secured to prevent unauthorized access or misuse.

Responsible Sharing:

1. Confidential information is shared only on a need-to-know basis and with appropriate authorization.


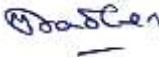
Breach Reporting:

1. Any suspected breach of privacy or confidentiality must be reported immediately for prompt action.

- **Consequence of violation of this policy**

Any inconsistency or violation this policy shall subject to investigation & may result in disciplinary action, suspension & termination of contracts & agreements and legal consequences.

In case of doubts & clarification on this policy please write us on hr@apsisaerocom.com or cs@apsisaerocom.com

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