

Code of Conduct

The code of conduct reflects our corporate values, rules and standards that guides our employees in their day-to-day work.

1. We stand for

In all our offices the conduct of managers and employees, both toward each other and towards clients, business partners are characterized by mutual respect.

Respect also means observing various Government & Statutory Laws wherever we operate. There is no alternative to conducting our business in a responsible, fair and ethically irreproachable way. The Code of Conduct is binding on all Board Members, Employees of NSSL.

Our corporate responsibility towards the environment, society and our employees, are demonstrated clearly in our business practices and our daily work.

Overall, our Code of Conduct describes behaviours, beliefs and standards that we aspire to and view as the basis of our established practice. It is an indispensable part of our corporate identity, reflects our corporate values.

The Board of Directors endorses the values outlined in this Code of Conduct and expects all employees, executives and managers to be role models in their daily work and to contribute to a corporate culture characterized by respect.

2. Our Responsibility

All Board Members, Employees are called on to breathe life into the Code of Conduct and thus contribute to the success of our company.

- Familiarize with standards and values, attend training sessions and stay up to date.
- Report any violations.

Our employees, in particular, act as role models for integrity and respect. As an employee, you must ensure implementing Code of Conduct.

- Create a culture characterized by mutual respect, openness and trust.
- Do everything you can to promote the implementation of the Code of Conduct.
- Ensure that the employees under your supervision comply with the Code of Conduct and be a role model of these values in your daily work.
- Inform and advise your team about the standards and values set out in the Code of Conduct.
- Provide opportunities for others to voice concerns openly and directly.

3. Our Standards of Working Together

Diversity and Inclusion

The diversity of our employees is our genuine strength. We promote an inclusive work environment that values the diversity of our employees and in which everybody feels accepted and can be their best every day. It is our firm belief that diversity and inclusion contribute to our company's success.

The main criteria for employee selection and promotion are skills and qualifications.

We expressly reject any form of discrimination based on gender, ethnic and national origin, race, colour, religion, age, disability, sexual orientation and identity or any other characteristic protected by law. All of us are called on to contribute to an environment of respect that precludes any kind of harassment, including workplace bullying, unwelcome sexual advances, unwanted physical contact, inappropriate propositions, or a working environment tainted by insulting jokes and remarks or demeaning comments. We do not tolerate any kind of violence in the workplace, including but not limited to threatening and intimidating behaviour.

Sustainable Employee Engagement

We firmly believe that the motivation and engagement of our employees are an important differentiating factor in our industry and make an essential contribution to our business success. It is for this reason that mutual esteem and respect are part of our shared values. We are committed to fair and open discussions and to dealing constructively with different opinions to ensure that we reliably achieve our common objectives.

4. Our Corporate Responsibility Standards

Health and Safety at Work

The safety, health and well-being of our employees are top priorities for us, so we place great importance on compliance with our occupational health and safety policies and with legal regulations and industry standards.

To promote physical and mental well-being over the long term, we expect our managers to provide for a healthy working environment. At the same time, all employees are likewise called on to take personal responsibility in this regard.

Environment and Climate Protection

Our business activities are primarily guided by our commitment to minimize the impact on the environment and the climate. NSSL environmental and climate protection program is predominantly aimed at preventing and reducing emissions of greenhouse gases and air pollutants. Every single contribution made by our employees helps to reduce our carbon footprint.

5. Our Standards for Business Activities

Working with Suppliers

We share with our vendors basic principles of ethical behaviour, compliance with legal standards and respect for the environment. We expect them to base their actions on the same principles.

Accounting and Reporting

The correctness and accuracy of accounting and financial reporting records provide the basis for our decision-making processes. We expect all business transactions in our accounting and reporting systems to be reported in a timely, accurate and complete manner in accordance with established procedures and applicable accounting standards. Documents and reports must contain the necessary information about all transactions and be stored in accordance with corporate guidelines and relevant laws and regulations.

6. Anti-Corruption and Anti-Bribery

We do not tolerate corruption. In our relationships with business partners and public officials, we do not provide or accept payments or benefits that are intended to, or might appear to, influence business decisions or to otherwise gain an improper advantage. This includes so-called facilitation payments or other benefits provided to public officials for routine non-discretionary actions.

7. Gifts, Hospitality and Other Benefits

Gifts, hospitality and other benefits are only permitted in day-to-day business as long as they are within socially accepted norms. In particular, they may not be, nor give the impression of being, able to influence current or future business decisions.

Only gifts, hospitality or other benefits that comply with the principles of our Anti-Corruption and Business Ethics Policy may be given or accepted. If necessary, obtain the approvals listed there.

Strict rules apply if you have business dealings with public officials. Be sure that you are familiar with and adhere to the guidelines set out in the Anti-Corruption and Business Ethics Policy when interacting with public officials.

8. Free Competition

We are committed to the principles of free enterprise and open competition. Company business must be conducted on the basis of merit and open competition. We hire third parties, such as suppliers, consultants or other intermediaries, only after careful and fair assessment. We are legally bound to make business decisions in the best interests of the company and without any forbidden restraints such as illegal collusion or agreements with competitors. We avoid any conduct that violates antitrust laws.

9. Conflicts of Interest

We expect you to maintain high ethical standards in dealing with conflicts of interest. A conflict of interest exists if your private activities or relationships could, or could appear to, result in you no longer being able to perform your duties for NSSL.

10. Our Security and Information Management Standards

Company Property

All of us have a responsibility to safeguard and properly use property of NSSL. The use of company property (including labour, supplies, equipment, buildings or other assets) for personal benefit is prohibited where not explicitly allowed by special agreements.

We attach great importance to the protection of intellectual property from unauthorized use or disclosure. Such property includes trade secrets; confidential information; copyrights; rights to trademark, patent and design protection; customer lists; business opportunities; and product specifications.

Data Protection

Our data protection management system guarantees appropriate, compliant and careful processing of personal data. This includes all information that gives insight into the identity of a natural person, such as name, address, telephone number, e-mail address, date of birth.

Information Security

Digitalization is a strategic imperative for enhancing the dialogue with our employees and customers and improving our operational efficiency. Safeguarding our IT infrastructure against tampering and unauthorized access is therefore a high priority. We use strict information security standards to protect information relating to our company, clients, business partners and employees. They enable us to maintain confidence in our services and safeguard our business continuity.



Suryanarayana Murthy Pattisapu
Chief Executive Officer

