

1. CODE OF BUSINESS CONDUCT AND ETHICS

Objective

This policy places employees' personal responsibility at the highest level to enhance the Company's principles and culture. The principles set forth in this policy describe the manner in which employees should conduct themselves. This policy emphasises on mandatory compliance with all laws, rules and regulations related to Company activities and appropriate conduct by employees such as to avoid even the appearance of impropriety.

Process

All the employees must adopt and promote the following principles set forth in order for the Company to fulfil its commitment towards providing a diverse and inclusive work environment, free of all forms of unlawful discrimination, including any type of harassment.

In the event of non-conformance with these principles, the employee who experiences or witnesses such irregularity must take the HR Executive in confidence and sort his/ her assistance. Based on the gravity of the non-conformance, the issue must be escalated to the management who shall take appropriate disciplinary action.

Respect

Any company's greatest strength lies in the talent and ability of its employees. Since working in partnership is vital to the LSPL's continued success, mutual respect must be the basis for all work relationships. Engaging in behaviour that ridicules, belittles, intimidates, threatens or demeans, affects productivity, can negatively impact the Company's reputation.

Equal Employment Opportunity

The talents and skills needed to conduct business successfully are not limited to any particular group of people. LSPL has a long-standing commitment to a meaningful policy of equal employment opportunity. The Company's policy is to ensure equal employment and advancement opportunity for all qualified individuals without distinction or discrimination based on race, colour, religion, gender, sexual orientation, age, national origin, disability, covered veteran status, marital status or any other unlawful basis.

Sexual Harassment and Other Discriminatory Harassment

Sexual harassment and other discriminatory harassment are illegal and in violation of LSPL's policies. Actions or words of a sexual nature that harass or intimidate others are prohibited. Similarly, actions or words that harass or intimidate others based on race, color, religion, gender, sexual orientation, age, national origin, disability, covered veteran status, marital status or any other unlawful basis are also prohibited.

Conflicts of Interest

LSPL's policy prohibits conflicts of interest which occur when the employees' private interest interferes with the interests of Company. In addition to avoiding conflicts of interest, the employees should also avoid even the appearance of a conflict.

All potential and actual conflicts of interest or material transactions or relationships that reasonably could be expected to give rise to such a conflict or the appearance of such a conflict must be disclosed.

In view of the same, the employees are also prohibited from competing with the Company and from using corporate property, information or position for personal opportunities or gain.

Company and its associates will not directly or indirectly engage in bribery, kickbacks, payoffs or other corrupt business practices, in their relations with governmental agencies or customers.

Confidentiality

The Company is committed to preserving customer and employee trust. All information, whether relating to business, customer or other employees, must be treated in a confidential manner, and disclosing it is limited to those people who have an appropriate business or legal reason to have access to the information. In addition, the details of the company meetings must be kept confidential. No person shall use audio or video equipment to record these meetings without the specific prior authorization of the head of your department.

Usage and Safeguarding of Corporate Assets

Safeguarding computer resources is critical because the Company relies on technology to conduct daily business. Software is provided to employees to enable them to perform their jobs and is covered by federal copyright laws. No employee must duplicate, distribute or lend software to anyone unless permitted by the license agreement.

The Company provides electronic mail (e-mail) and Internet access to assist and facilitate business communications. All information stored, transmitted, received, or contained in these systems is the Company's sole property and is subject to its review at any time. All e-mail and Internet use must be consistent with Company's policies, practices and commitment to ensuring a work environment where all persons are treated with respect and dignity.

The employees must use computers/ laptops and other electronic devices provided by the Company for discharging their official duties appropriately in accordance with Company standards and ensure their security and of all data from loss, damage or unauthorized access, reporting all instances of unauthorized access to the Administration Department.

Cleanliness and Order

It is the responsibility of all employees to ensure that the office of the Company is kept neat and tidy at all times. The work area should be cleared off of all files and papers every evening prior to leaving the office. Electronic equipment and any lights in the work area should be switched off.

Dress code

The employees should be appropriately dressed and presentable at all times during working hours at all times. Employees are expected to use their discretion in determining what appropriate office wear is. They should adhere to the following dress code.

Particulars	Men	Women
Weekdays	It is mandatory to wear formal shirts, trousers and shoe. Tie is optional for meetings with client in office or outside office.	Western formal attire (formal/ semi-formal shirts, trousers, shoes) Indian formal attire (Saree or salwar suit or kurtis).
Weekend (Friday and Saturday)	Smart casual attire. Employees should wear formals even on weekends in case of client meetings.	Smart casual attire. Employees should wear formals even on weekends in case of client meetings.

Employees at specific client locations should compulsorily wear uniform given to them.

Smoking

Smoking is strictly prohibited within office premises. In order to maintain a clean and healthy atmosphere in the workplace and out of our concern for all the employees, smoking is prohibited within the office premises.

Internet Use Policy

All employees and associates (eg. Consultants) of LSPL must act responsibly while using the Internet to conduct business by or on behalf of the Company and/or when the Company or its products or services are identified.

The Company reserves the right at all times to monitor, access and decrypt associates' use of the Internet, Company property, equipment, phone lines, computers (including disks, drives, storage media, electronic mail, etc.) and information.

All users are expected to use good judgment when using the Internet. The Company strictly prohibits:

- displaying, uploading, downloading, disseminating, participating in bulletin board or electronic forum discussions regarding subject matters containing inappropriate materials or information that may be offensive to others;
- in accordance with the Company's standards of business conduct, hacking or other attempts to penetrate non-public systems or any dishonest, defamatory, fraudulent, immoral, illegal and/or unethical activities; and
- using Company's name or property or a Company-provided Internet access ID to conduct business on behalf of an entity other than Company or on behalf of any individual, including yourself; to represent yourself as someone else; or to solicit Company associates.

No person may conduct business by or on behalf of Company with third parties using personal access accounts or IDs.

Misuse of Company resources will result in appropriate disciplinary action up to and including termination.