

Our Team :

At **Kayena manasa vacha tech innovations**, our mission is to provide best information technology services to our esteemed customers. we understand the global needs. Its our pleasure to provide the services like web application development, application maintenance services. We are looking forward to serve the customers in best possible ways.

As **developers** and **teams**, you hold immense power. Technical excellence is our **baseline**, but it is **not our only** goal. We believe in aligning everything we do with our core values (**EIIF**): "Excellence, Integrity, Innovation, Fairness in diversity".

I ask every one of you to use this Code of Conduct as your checklist in everything that we do in our company. We operate in a fast-paced industry, but we must never sacrifice our integrity for short-term gain. Customers only adopt technology they trust , therefore, integrity is not just a moral choice but a business strategy.

In our workplace, I encourage a safe, fair, and inclusive environment for all.

If you encounter a situation where the right path isn't clear, I encourage you to **Stop, Think, and Ask.**

Thank you for your dedication to these principles and for making Kayena manasa vacha tech innovations a leader in both innovation and ethics.

Regards,

Hanumappa Kalavathi

Managing Director



CORE VALUES

Excellence

To deliver high-quality output and maintaining high standards under any circumstances while pursuing Continuous Improvements by learning

Integrity

We act with transparency, prioritizing ethical decision-making over short-term profits and strictly adhering to all legal and professional standards

Innovation

Turning creative ideas into practical solutions that add value, innovating through new methods and different perspectives

Fairness in diversity

Actively hiring diverse talent, providing equal access to opportunities, and maintaining transparent policies that eliminate bias.



Our Code of Conduct

Why Code:

Our Code of Conduct provides a clear and simple framework for conducting our day-to-day business ethically. It ensures we uphold the trust of our clients and partners while protecting our reputation.

What are My Responsibilities:

As members of the company, everyone must understand the following points regarding our Code of Conduct :

- Adherence to the Code of Conduct is mandatory in all day-to-day business activities.
- Everyone is responsible for understanding and complying with all company policies, procedures, and laws applicable to their job role.
- Encourage your team to raise issue and Speak up.

To whom does Code of Conduct apply?

All Employees : Every person in the company, regardless of their role or seniority.

External Partners : All contractors, consultants, and freelancers.

Third Parties : Vendors, suppliers, and partners who conduct business with or for us.

What happens if we don't comply with code of conduct:

Trust is our most vital asset. If we fail to adhere to our values or our Code, we risk losing the client confidence that sustains our company.

Any violations of our Code, Core Values, company policies, or applicable laws are taken seriously. Depending on the severity of the breach, disciplinary actions may include a formal warning, termination of employment, or legal action as permitted by law.

If you encounter any violations of the Code of Conduct or activity that compromises our ethical standards, please reach out to your Manager, Human Resources (HR) or the Audit Team.

Note: The Code of Conduct cannot address every possible situation. If you are ever in doubt, please reach out to your Manager, Human Resources (HR) or the Audit Team.

Report it!

The most important part of an ethical culture is to encourage everyone to report issues without fear.

We are committed to an open and honest environment. If you see something that doesn't feel right - whether it is a safety risk, harassment, or unethical business behavior - you have a responsibility to speak up.

Who to Contact

You can report concerns to :

- Your Manager,
- Human Resources,
- the Audit Team (audit.team@kmti.com)
- Support Call +91 81520 95690

Our Promise (Non-Retaliation)

We strictly prohibit retaliation against anyone who reports a concern in good faith. You will not be punished, demoted or sidelined for doing the right thing.

Confidentiality

Every report is treated with the utmost discretion and will be investigated thoroughly and fairly.

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RESPECT EACH OTHER



We strive to provide everyone in the company with a work environment free from discrimination and harassment. We do not tolerate discrimination or harassment based on race, color, gender, religion, national origin, or any other legally protected status.

Tips

- We hire talent based solely on merit and business requirements. We do not discriminate on the basis of color, gender, religion, or any legally protected status.

MAINTAINING RECORDS , AUDITS



Maintaining Records

- In India, statutes like the Income Tax Act, 1961 and the Companies Act, 2013 mandate the maintenance of specific books to ensure accurate tax assessment and transparency. Retention period of up to 7 years or as applicable law.
- Systematic records provide real-time insights into profitability, helping owners decide when to expand or cut costs
- Regular reconciliations and internal audits help identify discrepancies, reducing risks of internal theft or errors.

Tips

- our duty is to maintain accuracy of all financial statements and accounting records.

Auditor

The auditor has a duty to provide reasonable assurance that financial statements are free of material misstatements. And evaluate whether the company adheres to internal policies and relevant external regulations.

we are obligated to cooperate with auditors in good faith, as applicable by law.

Other Regulators

we are obligated to cooperate with Regulators or law enforcement agencies in good faith, as applicable by law.

PROTECTING COMPANY ASSETS AND CONFIDENTIAL INFORMATION



We always ensure reasonable mechanism in place to protect company confidential information.
And to protect company assets.

I. Information

All **data**, whether in **electronic** or **physical form**, must be classified and protected based on its level of confidentiality.

At Our Company, we utilize the following three classification levels:

- **Public**: Information intended for external audiences. e.g., marketing brochure
- **Confidential**: Business data that could harm the company if leaked. e.g., Contracts, sales reports
- **Highly Confidential**: Extremely sensitive data requiring the highest security. e.g., Source code, Password, PII(Personally Identifiable Information)

II. Asset

The use of company assets for personal, unlawful, unauthorized, or unethical purposes is strictly prohibited. While company assets like printers and computers are intended for business purposes, incidental personal use is permitted, provided it results in minimal cost to the company and does not violate any laws or company policies.

Tips: Use of printer is allowed for incidental personal use within acceptable usage.

PROTECTING COMPANY ASSETS AND CONFIDENTIAL INFORMATION



III. Information of clients and third parties

Protecting the confidential information of clients and third parties is both a contractual obligation and a legal requirement under data protection laws like GDPR or India's DPDP Act.

We are committed to protecting the confidential information of our clients and third parties with the same degree of care as our own. Such information must be used solely for intended business purposes and must never be disclosed to unauthorized individuals, even within the company.

COMPETING FAIRLY AND FAIR DEALINGS

I. Competing Fairly

We are committed to competing fairly and ethically in all markets where we operate. We win business based on the quality of our products and services, not through unfair advantages, collusion, or deceptive practices.

Don't

the employees **must never discuss** sensitive topics with competitors such as Price Fixing , Market Allocation or any thing which is forbidden by law

The employees **must never Attempt** to steal trade secrets, bribe a competitor's employees for info or any thing which is forbidden by law

The employees **must never make** false claims about a competitor's products to make yours look better or any thing which is forbidden by law.

DO

It is normal to study the competition, but the methods must be legal and ethical.

Tips : Use public information available such as websites, news

COMPETING FAIRLY AND FAIR DEALINGS



II. Fair Dealings


We are committed to fair dealing in all our business relationships (Customers, Suppliers and Vendors). We strive to outperform our competition fairly and honestly, and we do not seek competitive advantages through illegal or unethical business practices.

Tips

Avoid misleading claims about product capabilities, pricing, or delivery times.

Clearly explain terms and conditions, especially regarding fees or cancellation policies.

BUSINESS ETHICS



We act with transparency, prioritizing ethical decision-making over short-term profits and strictly adhering to all legal and professional standards.

I. Prevention of Corruption (Anti-Corruption)

Our company is legally responsible for the actions of our employees and agents. To protect the organization and ensure we maintain 'adequate procedures' against bribery, every member is required to follow our anti-corruption protocols without exception.

Our Company is subject to all relevant anti-corruption laws like Prevention of Corruption Act, 1988 (India). Corruption is bad business. Corruption is anti competitive.

Our policies strictly prohibit improper payments such as below to any individual:

Bribes: Offering, giving, or promising anything of value (cash, gifts, or favors) to influence a customer's decision-making process.

Kickbacks: A form of negotiated bribery where a portion of the contract value is "kicked back" to the individual who facilitated the sale.

Financial Inducements: Any broad category of "sweeteners," such as unapproved discounts, lavish entertainment, or excessive travel expenses intended to sway a buyer

BUSINESS ETHICS



Government officials

Special care must be exercised when interacting with government officials. This category includes employees or officials or any individual associated with political party, military services, judicial system or any govt agencies are considered government officials. Special care is also needed when dealing with the families of government officials, as this helps prevent indirect corruption.

3rd Party Supplier or Vendors

A copy of Supplier Code of Conduct must be provided to any third party required to interact with government authorities on behalf of the company. We must verify the reputation of these parties and ensure a formal contract is executed, requiring them to comply with all applicable anti-corruption and local laws.

A copy of the Supplier Code of Conduct must be provided to and signed by all third-party suppliers and vendors.

BUSINESS ETHICS



II. Gift and Entertainment

When offering gifts to **customers** or **government officials** or **any individual**, you must ensure the gesture is a legitimate mark of appreciation and to obtain or retain business or gain an improper advantage.

Things to keep in mind :

- Gifts must be given only to show gratitude for a business relationship. They should never be intended to obtain or retain business or gain an improper advantage.
- Lavish or overly expensive items (like luxury watches or jewelry) are major "red flags" and can be legally interpreted as bribes.
- Gifts **must never** be given in the form of cash or cash equivalents, such as gift cards or vouchers.
- Every gift must be transparent and accurately recorded in Company register including details such as receipt, value, Business reason.
- You must comply with our Anti-Bribery and Anti-Corruption policy.

BUSINESS ETHICS

III. Anti Boycott Laws

During our business activities, we may receive business requests to boycott certain countries, companies, or other entities. These requests can take the form of refusing to do business with specific groups or seeking information about boycotted entities. We must not participate in any boycott that is not officially initiated or mandated by applicable governments.

We need to report any such boycott request to applicable governments. if you encounter such cases, please reach out to audit team(audit.team@kmvti.com) for further assistance.

BUSINESS ETHICS

IV. Conflict of Interest

A conflict of interest arises when personal interests including financial holdings, relationships or outside employment interfere with an individual's professional responsibilities to the company.

A conflict of interest can also occur if any family member receives improper advantages as a result of your position in the company

All your such situations should be disclosed with Manager, Human Resources.

Tips

- Example of conflict interest : Hiring a relative to work at the company through improper recruitment processes, Working for competitor is also a conflict of interest.
- Board members are permitted to serve on the boards of other entities, provided such service does not create a conflict of interest regarding the company's business strategies or proprietary technologies.

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