



## Code of Conduct V1.0

**Issued By: Department of Human Resources**

**Policy No: HRD/IP/01-05-19**

**Regions: All**

**Scope: StarLink**

**Governance: HR-HQ**

**Process Regulator: Department of Human Resources**

**Effective Date: 1<sup>st</sup> May 2019.**

### 1. Introduction

conducts business with uncompromising integrity and professionalism. As part of our Corporate Governance framework and in discharging our responsibilities to all our stakeholders, we actively support good practice and continuous improvement in this area. All suppliers and our employees are required to comply with STARLINK's ethical expectations regardless of local business practices or social norms. This Code helps to ensure fairness in our supplier selection processes protects our corporate reputation and enables expanded business with our customers.

The STARLINK Code of Conduct contains language from best practice including, recognized standards such as International Labour Organization Standards(ILO), Universal Declaration of Human Rights (UDHR), Social Accountability International (SAI) and the Ethical Trading Initiative (ETI) were used as references in preparing this Code and may be useful sources of additional information. As an extension of the Code, STARLINK maintains a series of detailed standards that clarify our expectations for compliance.

STARLINK intends to take all action necessary to maintain the reputation for conduct in accord with the highest levels of business ethics and law compliance. The employees of STARLINK to own, and conduct, so that The company may fulfil its obligations to observe the law and public policy of various nations, and to deal fairly with its owners and partners, its employees, its customers, the communities in which it operates and the general public.

Failure to observe the Code of Corporate Conduct can result in serious consequences, including the possibility of criminal prosecution of individuals as well as the company's monetary losses and of primary importance, the loss Company's good name.

The employees of STARLINK are to review carefully the material contained herein, to familiarize themselves with the Corporate Policies on which these summaries are based, and to accept the responsibility to act always as good corporate citizens and worthy representatives of STARLINK.

### 2. The Responsibility

It is the responsibility of the employees of STARLINK to adhere to the Code of Corporate Conduct and to ensure that they supervise, and adhere to the policies contained therein.

The primary responsibility for compliance rests with line management and the Unit Head – not with the lawyers, the controllers or the auditors, though each is available to assist the manager – and this responsibility cannot be delegated!

- It is expected of the employees not to use company resources for any personal issues unless otherwise authorized by Human Resources Department.
- Employees are expected not to misuse any company giveaways which are mainly for customers. Distributing it to STARLINK employees needs approval.
- Employees are to make proper use and care of company assets given to employees (Laptop, mobile, demo units, etc.)

### **3. Business Practices**

As a manager, the employees of STARLINK are responsible for ensuring that all employees under their supervision perform their duties in accordance with the highest standards of business ethics and in conformance with applicable law.

The employees of STARLINK are to take every action necessary to ensure that no entity or employee engages directly or indirectly in any corrupt business practice, including bribery, kickbacks or payoffs.

With reference to the use of sales agents, the employees of STARLINK will use only those who operate legitimate independent businesses.

Use of funds and assets under the control of the employees of STARLINK is their responsibility. These funds and assets are not to be used for other than legitimate, ethical business purposes. The employees of STARLINK will assure that no false or artificial corporate records are made and that there are no unrecorded corporate assets.

### **4. Procedures establish to control expenditure and transfer of Unit /Corporate /Group funds**

Control of corporate funds is the moral responsibility of the employees of STARLINK as well as a legal duty. It is up to the employees of STARLINK who are as Managers to ensure that any expenditure or transfer of corporate funds is made in accordance with a stated, legitimate purpose and to the recipient indicated in records. Any deviation or attempted deviation from the above should be brought directly to the attention of the appropriate controller or legal counsel.

### **5. Conflict of Interest**

A conflict of interest occurs when an STARLINK's employee or supplier's personal or family interests interfere or even appear to interfere with their ability to make a sound business decision in the best interests of STARLINK. Both employees and suppliers alike must avoid activity which may interfere or appear to interfere with the proper performance of their duties.

As long as the employees of STARLINK remain in employment of the group, the employee's duty is to act in business matters solely for the benefit of the STARLINK.

The employee's salary and other corporate benefits are full compensation for services of the employees of STARLINK. The employees of STARLINK must particularly avoid any act, which might produce an unauthorized private financial benefit for him/her or the family, friends or business associates. The employees of STARLINK and those under their supervision must not become involved for personal gossip with competitors, customers or suppliers.

Addressing/Managing the Conflicts of Interest :

Disclosure provides transparency to actual, potential, or perceived conflict of interest risks to StarLink. It is a necessary part of mitigating these risks, but disclosure alone is not sufficient. This Policy also requires addressing a conflict of interest. Addressing a conflict of interest is the responsibility of the Manager.

Specifically, StarLink expects the Manager to:

- Treat the information disclosed by the employee with appropriate confidentiality and without bias.
- Fairly evaluate the conflict of interest situation disclosed by the employee, including the risks to the business interests and reputation of StarLink.
- Seek guidance if needed from the Head of the department/Director and from supporting functions, including Legal, HR & Compliance.
- Make a pragmatic decision to address the conflict of interest so that risks to StarLink are minimized and the personal interests of the employee are protected as far as possible.
- Communicate the decision and its reasoning to the employees and follow up to ensure the employee understands and complies with it.
- Retain documentation of the decision and provide an email to the employee and if required legal actions are taken.
- Many conflict of interest situations can be addressed in a simple and mutually acceptable manner; pro-active, open dialogue between Managers and their employees is essential to support this outcome.

## **6. Acceptance of gifts, Goods, Money or Services**

Neither the employees of STARLINK nor any member of his/her immediate family may accept any personal gift or favour from any competitor, customer, supplier or anyone with whom STARLINK does business with. The only exceptions to this Policy are token, non-money gifts or hospitality offered in connection with performing company business, under circumstances fully disclosed to and approved by the officer to whom the employees of STARLINK directly or indirectly report to. In any other circumstance acceptance of gifts can suggest that an improper business relationship exists.

Directors, employees and contractors must use extreme caution and conservative common sense in accepting gifts, gratuities and entertainment, following these general guidelines:

- They may not solicit any form of personal gift or gratuity;
- They shall not accept personal gifts of money, credits, or purchasing discount's in any amount From vendors or from clients; they may accept non-monetary personal gifts (including meals, Product samples, event tickets, etc.) if such gifts have small nominal value (less than \$50) strictly as a gesture of goodwill, in the spirit of seasonal giving, or for public relations purposes, and only if such gifts are given and received with no expectation of reciprocal obligation;
- If a director, employee or contractor receives a personal gift of any size from a vendor or Client, the person shall disclose to the Company what the gift was, its estimated value, from whom the gift was received, the date on which it was received, and the understood reason for which the gift was given;
- If a director, employee or contractor receives an unsolicited gift exceeding nominal value, the person should either, return the gift to the sender, pay the sender full market value for the gift, donate the gift to the Company, or after registration of the gift with Company donate the gift to a charitable organization.

## **7. Policy on Non-partnership**

The Management encourages the employees of STARLINK as individuals to participate actively in the affairs of the employee's community and of the country.

This activity, however, must take place in the employee's own time and at his /her expense. In no way can the STARLINK or any of its affiliates become involved in campaigns or affairs. No corporate material or funds may be expended in support of the activities.

## **8. Standards of Conduct by Employees in Relations with Government Employees**

The employees of STARLINK must ensure that they are responsible refrains from offering gifts for personal use (except company branded giveaways provided by the company), gratuities, or non-business related entertainment to employees of any government agency to which is seeking to sell goods or services.

The employees of STARLINK should not take gifts, travel, food and lodging expenses for government agency employees transacting business, unless the company approves the same and the government involved is aware of and concurs in this gesture.

Policy does not prohibit offering a gratuity to a government employee to obtain timely, routine service to which the payer is entitled in countries where this practice is common and customary. The employees of STARLINK are strictly forbidden to authorize or make any payment or gift to or for the benefit of any government employee for the purpose of obtaining or retaining business for or directly business to any entity.

## 9. Use of Representatives by Units

As a manager the employees of STARLINK must ensure that every agreement with sales agents or representatives is in writing and signed by the parties, contains all terms agreed upon, and conforms to the requirements of our accounting procedures.

Every STARLINK employee has to act on behalf of the Management only up to the extent of the value and nature permitted by the authorized signatory in writing, either by a letter of authorization or through a specific power of attorney issued by the authorized signatory by virtue of a board resolution.

Save and except under the circumstances mentioned as above, **no employee** shall sign any long-term agreement with any external or internal institution or with any individual except with the written approval by the authorized signatory.

The agent, its employees and owners must be engaged in providing legitimate business services for a fee not in excess of the customary local rate for services, and be free of involvement with existing or potential customers. Any payment made to sales agents or representatives must be fully documented.

The employees of STARLINK will use reasonable vigilance to assure that no employee and no agent, directly or indirectly, make or authorize any payment or gift to any representative of a potential or actual government or commercial customer for the purpose of obtaining or retaining business for or directing business to any entity.

## 10. Disclosure of Operations Financial Information

The employees of STARLINK will exercise care to see that neither their employees, nor anyone reporting to them releases, either in writing or orally, financial information regarding the operation without prior review and approval by the appropriate executive (superior).

Employees travel accommodation, expenses and customers entertainments activities needs to be done in reasonable manner without exaggeration

## 11. Equal Employment Opportunity

The Management strongly supports the Policy of equal employment and advancement opportunity.

The Management expects each STARLINK Manager to take measures that will ensure that every applicant for STARLINK employment and every STARLINK employee under his or her supervision is treated equitably and in accordance with the group Policy.

## **12. Responsibility of Unit Managers Relative to Compliance with Safety and Environmental Health Laws and Regulations Environmental Health**

Our corporate commitment expressed requires every STARLINK manager to develop programs to eliminate or minimize, to the extent feasible, any hazards to the health and safety of all employees. It is the employees of STARLINK responsibility to see that such programs are in place.

## **13. Responsibility of all STARLINK employees for Compliance to Non-disclosure agreements entered by STARLINK**

“Information” means non-public information that STARLINK has entered in agreement with any of its Vendors, resellers, sub-distributors, clients etc designates in writing thereon, or by an appropriate stamp or legend, to be of a confidential nature, then all employees of STARLINK are bound to comply such confidential information to their best of their efforts, Knowledge and belief. Such Information shall mean and include released or unreleased software or hardware products, and documentation or manuals of same; or Information relating to the marketing or promotion of any product, business policies or practices, including but without limitation, lists of customers, business volumes or usage, financial information, pricing information, presentation and proposal materials, information related to mergers or acquisitions, formulas, security procedures, information concerning business plans or business strategy, the subject matter of this Agreement, data , including information relating to rights, the nature of the rights, production data, technical and engineering data, test data and results, status and details of research and development, information regarding acquiring, protecting, enforcing, and licensing rights, including patents, copyrights, and trade secrets; material regarding new product plans and prospective design requirements and characteristics now contemplated for Commercial and Federal customers; and Information received from others that the STARLINK is obligated to treat as confidential, including information for existing or forthcoming projects and existing or forthcoming customers etc.

## **14. Management of Environment Quality**

The employees of STARLINK and those reporting to them have a responsibility to protect the environment wherever the company is situated by complying with all applicable codes, conduct and regulations and permits.

The implementation of a formal Environmental Quality Program customized to the employees of STARLINK’s needs is essential to accomplish these obligations.

## **15. Safety and Fire Prevention**

The safety and physical well-being of our employees and the safeguards of our plant facilities are primary concerns of Managers Compliance with the safety laws and regulations of the countries in which the employees of STARLINK operate.

Compliance with the provisions of Policy on Safety and Fire Prevention are the employees of STARLINK's responsibility. The STARLINK Safety and Fire Prevention Manual list guidelines to be followed to comply with these requirements.

Each of the employees of STARLINK is personally responsible for action to achieve such compliance.

## **16. Safety of Products**

We have a duty to provide products to our customers which are safe for intended use and foreseeable misuse, and which comply with all applicable laws, regulations and standards. The employees of STARLINK must ensure the accomplishment of this objective by implementing a formal Product Safety Program customized to the employee's specific needs.

## **17. Quality policy**

We aim at delivering quality construction by utilizing advanced technologies and exceeding customer's expectations in terms of quality, safety and timely completion. We believe in continuous improvement through leadership and team work and close co-ordination with our subcontractors, vendors and customers. STARLINK's target is to remain as preferred contractor with proven track record.

STARLINK shall focus on continuous development of core competence of all STARLINK employees through awareness, teamwork and training. The company and its employees shall ensure safe practices are followed for the protection of personnel, equipment and customer properties. We shall adopt innovative methods and practices to enhance value to customers. STARLINK employees shall continuously monitor and interact with all subcontractors and vendors towards ensuring quality services and the progress of Purchase orders or work-orders to ensure timely completion to achieve total customer satisfaction.



To,  
Group HR Director,  
STARLINK

I Mr. /Ms .....

The employee of StarLink .....national,  
holding .....Passport bearing No: .....

Hereby confirm that I have read the code of conduct of this company, and have understood the contents therein and hereby declare that I will follow the code of Conduct without any deviation, with the best Interest, knowledge, and belief. I take the full responsibility for its compliance.

Solemnly declared This .....day of the Month of .....in the year .....

Signature:

Mr./Ms. ....