

CODE OF BUSINESS CONDUCT

OBJECTIVE

Forays objective in establishing this "Code of Conduct" is to promote ethics, honesty and professionalism within the company and among its employees. **FORAYS** (henceforth mentioned as the Company) believe in being an integrated organization and that the action of every employee affects its entire organization and reputation. Any employee is obligated to strive for the extension of the Company's interests within legal limits, and responsible of preventing damages or loss of the Company's interests. The company expects all employees to abide by this Code in carrying out their duties and functions so as to preserve public trust and to ensure the company's sustainable growth and development.

SCOPE

This policy and its related procedures and measures are applicable to all employees.

CONTENT

Each **FORAYS** Employee must:

- Conduct the Company's business with honesty and integrity and in a professional manner that protects the Company's good public image and reputation.
- Build relationships with customers, vendors and fellow employees based on trust and treat every individual with respect and dignity in the conduct of Company's business.
- Become familiar with and comply with legal requirements and Company policy and procedures.
- Avoid any activities that could involve or lead to involvement in any unlawful practice or any harm to the Company's reputation or image.
- Avoid actual or potential conflicts of interests with the Company, or the appearance thereof, in all transactions.
- Provide accurate and reliable information in records submitted, safeguard the Company's confidential information, and respect the confidential information of other parties with whom the Company does business or competes.
- Promptly report to the Company any violations of law or ethical principles or Company policies that come to the employee's attention, and cooperate fully in any audit, enquiry, review or investigation by the Company.
- The Company has a strong and clear stand against any form of harassment at the workplace. Harassment as a result of discrimination or which is sexual in nature and has the effect of creating an intimidating, hostile or offensive work environment is not allowed at Forays.

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RESPONSIBILITY

- All employees must uphold these standards in the conduct of Company business and the Company must handle, in a manner consistent with these standards and related policies, all actual and apparent conflicts of interest between personal and professional relationships and all other matters governed by this Code and such related policies. If a decision about a particular action is not covered specifically by this Code or related corporate policies, employees are required to seek guidance from their appraiser or appropriate internal resources, such as the Human Resources or Legal Department.
- Senior management should be a role-model for these standards by visibly demonstrating support and by regularly encouraging adherence by Program Heads / Team leaders. Appraisers should ensure all their employees receive guidance, training and communication on ethical behavior and legal compliance relevant to their duties for the Company.
- Failure by any employee to comply with this or any Forays policy will subject employees, including appraisers who ignore prohibited conduct, or have knowledge of the conduct and fail to correct it, to disciplinary action up to and including separation from employment with the Company.
- Amendments to this Code of Conduct shall be promptly disclosed by the Company. It is each individual's responsibility to maintain familiarity with this Code of Conduct as the company reviews and revises its content from time to time.
- The company may waive application of this Code of Conduct to employees in certain limited situations. Any waivers of the provisions of this Code of Conduct for executive officers may be granted only in exceptional circumstances by CMD.

