



CODE OF CONDUCT

*IIM LUCKNOW ENTERPRISE INCUBATION
CENTRE ("IIML-EIC")*

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I. INTRODUCTION

This employee Code of Ethics and Conduct (“Code”) details **IIM-Lucknow Enterprise Incubation Centre (IIML-EIC)** policies for employees. IIML-EIC is committed to building a quality reputation that values integrity, respect and truthfulness, citizenship and a strong commitment to the highest ethical standards. These principles apply to employee interactions with customers, co-workers, vendors, government and regulatory agencies, the general public, investors, and host institution. IIML-EIC’s employees must be familiar with this code and adhere to its guidelines.

In dealing with ethical problems not detailed in this Code, employees are expected to use common sense and their Best moral judgment. **If an employee has ethical question, please contact Faculty in Charge.** This policy may be modified or updated at any time. IIML-EIC welcomes employee’s suggestions on changes in this Code.

II. COMPLIANCE WITH APPLICABLE LAW AND REGULATIONS

IIML-EIC believes and practices to observe all law, rules and regulations of government agencies and authorities, applicable to the Organization. This specifically includes requirements under the various Corporate Laws, Taxation Laws, Labour Laws, Cyber Laws, Environment related laws and so on, as amended, the policies of funding agencies such as DST and UPECL, as well as other state and central laws. If Central, State or Local law exists that is either contradictory or stricter than this policy, the employees must apply the law.

III. CONFLICTS OF INTEREST

IIML-EIC’s employees must avoid having a personal, business, financial or other interest, activity or relationship outside IIML-EIC that has or may be in conflict with IIML-EIC’s or its Incubatees, Clients & Associates. **Any material transaction or relationship that may give rise to an actual or perceived conflict of interest should be discussed with Faculty in Charge.**

Conflicts of Interest may include, but not limited to, the following situations:

- **Outside Employment:** Employees should not perform work or render direct consulting or managerial services for an organization that competes or associated with IIML-EIC without appropriate approval from Management.

- Managers or Supervisors should not engage in a sexual, romantic, or dating relationship with sub-ordinate employees or trainees.
- Accepting Loans or Gifts of entertainment, any form of benefits or Cash from Incubatees, from Vendors, Sub-ordinate employees, Regulatory or any Outside concern that does or seeks to be associated with or is a competitor to IIML-EIC, or investor etc. Customary gifts exchanged during festival season, which have only nominal value are excluded from this clause.
- Obtaining a personal finance benefit in any in any manner with regard to affairs of the company other than employment related benefits
- Performing services for associates, Incuabtees and clients outside those consistent with IIML-EIC
- Using or disclosing any confidential information gained during employment for an employee's personal benefit or the benefit of others, including a future employer.

IV. EMPLOYMENT PRACTICES

All employees of IIML-EIC shall consider and follow the under stated practices:

A. Discrimination and Harassment

IIML-EIC prohibits discrimination and harassment of clients, Incubatees, vendors or employees whether or not the incidents occur on IIML-EIC's premises and whether or not the incidents occur during business hours.

IIML-EIC follows Central, State and Local law to ensure equal recruitment, employment, compensation, development and advancement opportunity for all qualified individuals, and prohibits deliberate harassment based on Race, Color, Religion, Sex, National Origin, Age or Disability.

B. Workplace Violence

IIML-EIC does not tolerate workplace violence including threats, threatening behavior, harassment, intimidation, assaults, abusive language or similar conduct.

V. BOOKS AND RECORDS

A. Accurate and Complete Business Records

Employees must act in good faith not to misrepresent material facts in IIML-EIC's books and records or in any internal or external correspondence, memoranda, or communication of any type, including telephone or electronic communications.

B. Financial Reporting

All IIML-EIC's funds, assets, liabilities and receipts must be recorded in accordance with generally acceptable accounting procedures. There cannot be any "off the books" accounts.

C. Proper Maintenance of Records

IIML-EIC maintains documents in accordance with all applicable laws and regulations. Managers needs to ensure that all records are in place in proper manner

D. Cooperation with Auditors

IIML-EIC's employees must cooperate fully with Internal and Outside Auditors including auditors from funding agencies during examination of IIML-EIC's books, records, and operations.

VI. ADMISSION PROCESS

A. Business Communications

Employees must avoid public statements regarding issues or matters of IIML-EIC about which they are not authorized.

B. Advertising and Marketing

IIML-EIC's policy takes necessary steps to assure that all advertised services in any of its promotional activities , literature, exhibits or other public statements is true, supported by documentation, and does not mislead associates or any other respective authority. Employees needs to adhere to this.

VII. USE OF COMPANY RESOURCES

A. Internet and Electronic Mail Policy

Employees may use Internet and send and receive electronic mail solely for Business purposes.

IIML-EIC's electronic mail system is a company resource, and IIML-EIC reserves the right to read, view and copy any email communications.

Employees must take reasonable care not to disclose confidential information, or acquire unauthorized information over the Internet.

B. Equipment and Supplies

All equipment and supplies purchased by IIML-EIC remain IIML-EIC's property, including but not limited to office supplies, office furniture, fax machines, computers, software, hardware, supplies and equipment, and should not be used by IIML-EIC's employees for personal reasons.

C. Non-Work Related Interests

IIML-EIC's employees should not use IIML-EIC's facilities to promote non-IIML-EIC or non-work related interest of the employee or of third parties without prior consent of their supervisors.

D. Proper use of Organizational Assets

IIML-EIC's employees should only use, transfer, or dispose of funds or assets for the lawful and legitimate business purposes for which they were approved by their respective Managers.

VIII. PRIVACY AND CONFIDENTIALITY

A. Confidential Information

IIML-EIC's employees must exercise care to avoid disclosing non-public, internal, secret or proprietary information related to IIML-EIC or its vendors, clients, incubatees and associates to unauthorized persons, either within or outside IIML-EIC during employment or afterwards, except on such disclosure is legally mandated or approved by IIML-EIC Management.

B. Employees Access to Confidential Information

Only IIML-EIC's employees that truly need to know confidential information to conduct their affairs have access to confidential information and must take necessary steps to keep their information private and confidential.

C. Confidential Information of Employees

Employment and Medical records of IIML-EIC's employees are confidential and private. Medical records may only be disclosed if the employees provide a written release required by applicable law.

D. Financial Information of Current and Former Vendors/Clients

The financial information of Current and Former Vendors and Customers must be protected as required by privacy laws and regulations.

IX. COMPLIANCE WITH THE CODE

All IIML-EIC's employees must read and understand the Code and adhere to its guidelines. If questions arise please contact Faculty in Charge.

X. REPORTING ACTUAL OR SUSPECTED VIOLATIONS OF THE CODE

Employees must report any actual or suspected violations of this Code to Faculty in Charge. Failure to report any actual or suspected violation of the code is in itself is a violation of this Code.

A. Non-Retaliation Policy

Employees will not be retaliated against or subject to any form of reprisal for raising a good faith concern under this policy of participating in a Investigation into any such concerns. Retaliation is a serious violation of this Code and should be reported immediately.

B. Investigation of Alleged Violation of the Code

All inquiries, complaints and reports will be promptly investigated. Employees are expected to cooperate in the investigation. Reasonable measures will be taken to preserve confidentiality of the claim and the identity of anyone who reports a suspected violation or participated in the investigation. If you are unsure whether a violation has occurred, IIML-EIC encourages you to seek advice from Faculty in charge before acting.

XI. ZERO-TOLERANCE POLICY TOWARD VIOLATIONS OF THE CODE

IIML-EIC takes a zero-tolerance approach to violations of this Code, failure to report actual or suspected violations of the Code, or retaliation against whistleblowers. Employees that are found to have violated this Code of retaliated against whistleblowers will have their employment with IIML-EIC terminated.