



## **Ethics and Social Policy**

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## **Ethics and Social Policy**

1. Ethical conduct describes the way we carry out our business. We at Silverskills are committed to very high standards of ethical behaviour as described in our commitment to ethical conduct.
2. The commitments are expanded into policy expectations, which cover such topics as bribery, legality, conflicts of interest, business partners, gifts and entertainment.

## **Ethical Conduct Policy**

3. Our policy is a statement of the behaviours we expect from our people as they do business, together with some explicit boundaries around our actions. This approach reflects our overall management ethos, which demands a high degree of responsibility and autonomy at all levels in the organization. It helps us apply consistent principles in the many different circumstances and scenarios.
4. We will pursue our business with integrity, respecting the different cultures and the dignity and rights of individuals.
5. We are an Equal Opportunity Employer (EOE) and function without discrimination on basis of caste, race, gender, language or religion. The promotion and protection of all basic rights is a legitimate concern of business.
6. In our actions and our dealings with others, we will:
  - (a). Respect the rule of law
  - (b). Promise only what we expect to deliver, make only commitments we intend to keep, not knowingly mislead others and not participate in or condone corrupt or unacceptable business practices
  - (c). Fulfil our obligations and commitments, treat people according to merit and contribution, refrain from coercion and never deliberately do harm to anyone
  - (d). Act in good faith, use company assets only for furthering company business and not seek personal gain through abuse of position in the company
  - (e). We will expect the same commitments from third parties directly acting on Silverskills behalf.

7. Many ethical decisions involve dilemmas and require judgement in order to arrive at the best way forward. In cases of uncertainty, everyone working for Silverskills is expected to raise the issues within an open environment with their management and colleagues to obtain clarification. All employees have the right to make confidential reports directly to the senior management. In deciding whether or where to do business, it will be a precondition that we can implement our policy commitments in all our operations.

### **Policy Expectations**

8. We will respect the law of the land and the social community norms where we operate.
9. This includes competition and antitrust laws and the Foreign and Corrupt Practices Act. Where the law is unclear or conflicting, we will take expert advice but will always seek to act in accordance with these commitments.
10. We expect all employees to respect and obey the law of the land. In order to ensure that all employees hired are of a sound background we do a thorough reference and antecedent check as also a residence address verification supported by a neighbourhood check, to ensure the fidelity of data provided by the individual. To supplement this, we have a policy of giving preference to the hiring persons possessing a valid passport. This has been put in place as passport documentation entails an independent check by the state regulatory authorities on the background and criminal activities done, if any by the concerned individual.
11. A mechanism is also in place to quality check and audit the signing off of these confidentiality agreements. Time to time this audit is done by our specialized quality personnel on a random sampling basis to get a feedback on the robustness of this process. Our quality department is trained to design processes and conduct audits for high end and complex processes.
12. Silverskills will never offer, pay, solicit or accept bribes in any form, either directly or indirectly.
13. This includes those transactions formerly known as facilitation payments. Any demand for or offer of a bribe in whatever form to any Silverskills employee must be rejected and reported immediately to line management.
14. We will hold no secret or unrecorded funds of money or assets.
15. We will only give or accept gifts and entertainment that are for business purposes and are not material or frequent.
16. In consultation with the senior management, we will put in place rules to cover the giving and acceptance of gifts and entertainment, which reflect this

- expectation and local custom. We will never accept gifts or entertainment during the process of a competitive bid or tender exercise.
17. We will avoid situations where loyalty to the company may come into conflict with personal interests or loyalties.
  18. If such a conflict does arise, it should be declared in writing to more senior management, who must make sure that the individual is insulated from any decision-making or operation in the area of the conflict of interest.
  19. Silverskills does not employ forced labour or child labour.
  20. We do not use child labour in our own operations or in the provision of our services.
  21. Before we make major investments in a new area, we will evaluate the likely impact of our presence and activities.
  22. These assessments will consider the likely impact of major developments on local communities and indigenous peoples, local infrastructure and the potential for conflict and its implications for security.
  23. Silverskills will never make political contributions whether in cash or in kind anywhere in the world.
  24. Silverskills will continue to engage in policy debate on subjects of legitimate concern to the company, its staff and the communities in which it operates by processes such as lobbying.
  25. Silverskills welcomes its employee's participation in the political process as individuals in ways that are appropriate to each other.
  26. Fees for services rendered by third parties, including agents and consultants, must be for legitimate business purposes that are demonstrably commensurate with the service provided.
  27. We will not choose business partners to do things on our behalf that contravene these commitments.
  28. We will not employ agents to carry out actions that conflict with these commitments. In joint operations, we will apply these commitments where we are operators; where we are not, we will seek to influence our partners such that the joint operation adopts similar commitments.

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