

SECURITE

Quick Heal

CODE OF CONDUCT 2024

www.quickheal.com



THE FOUNDERS MESSAGE

Ethics are a manifestation of individual behavior, finding its earliest roots within the family. Similarly, organizations today play a crucial role in shaping and enhancing the conduct of their employees as they become their family at work. This not only brings enduring benefits for the individuals in their careers but also contributes to the development of a balanced and orderly society, ultimately advancing the nation's progress.

Our company, aligned with its values, culture, and objectives, has anchored its strength in unwavering integrity and elevated ethical standards. These pillars furnish us with a distinct competitive edge. The significance of our reputation cannot be overstated, as it resonates profoundly with our employees, business partners, investors, customers, and end consumers.

We take immense pride in the fact that Quick Heal Technologies Ltd. consistently garners substantial recognition from both internal and external stakeholders. This acknowledgment is a testament to our steadfast commitment to ethical leadership, values, transparency, an exceptional work culture, compliance, and social responsibility.

As we move forward, we are confident that each one of you will persist in upholding the elevated benchmarks of ethics, values, and culture, further solidifying Quick Heal's standing as the preferred organization for its employees, business partners, stakeholders, and consumers.

Dr. Kailash Katkar
Managing Director

Dr. Sanjay Katkar
Jt. Managing Director

CEO FOREWORD

In a dynamic corporate landscape, it is paramount that we are guided by the core values that define us as a company. Our code of conduct is a reaffirmation of the essence of these values, and a living testament to our collective dedication to shaping not just our corporate identity, but the very fabric of our corporate culture.

This Code serves as a constant reminder that our ethical mandate is not a task to be completed but a mindset to be embraced. This document serves as a road map, guiding each member of our team to uphold our values, safeguard our reputation, and contribute to a positive and inclusive corporate culture.

It also encapsulates the principles that make us who we are, emphasizing the importance of integrity, continuous improvement, and the unwavering pursuit of excellence. Our collective adherence to these principles strengthens our corporate culture, reinforces the trust placed in us by our stakeholders, and positions us as leaders in championing an environment of 'Integrity,' 'Innovation', 'Customer Centricity' and 'Leadership.'

Our culture, defined by acceptable behavioural standards, is based on integrity and honesty, respect and inclusion, compliance with laws and regulations, professional conduct, conflict resolution, whistle-blower protection, and continuous improvement. These standards are not merely guidelines; they are the building blocks of a workplace where accountability, excellence, and unity thrive.

As employees of Quick Heal Technologies, each of you is entrusted with the responsibility to uphold the principles outlined in this Code.

Together, let us be known as champions of ethical conduct, ambassadors of our core values, and contributors to a positive and inclusive corporate culture - ensuring that our purpose to continuously innovate, simplify, and secure remains at the forefront of our corporate identity, and our actions resonate beyond the confines of our organization.

Vishal Salvi
Chief Executive Officer



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OBJECTIVE

The Code of Conduct (“Code”) aims to establish and promote a culture of ethical behavior, integrity, and compliance with legal and regulatory standards among the employees of Quick Heal Technologies Limited and its subsidiaries (“Quick Heal” or the “Company”) to reinforce the commitment to ethical standards and compliance to law of the land. It outlines the principles and guidelines that govern our professional conduct, fostering a workplace environment built on trust, integrity, respect, and responsible business practices. This document serves as a guardrail for employees to uphold the company's values, safeguard its reputation, and contribute to a positive and inclusive corporate culture.

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APPLICABILITY

This policy applies to all employees of the Company, including full-time, part-time, contract, temporary, apprenticeship, and traineeship employees (“Employee(s)”). All Employees, regardless of the type of employment, must adhere to the principles outlined in this Code.

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OUR CORE VALUES



INTEGRITY

We always conduct ourselves ethically.

- No shortcuts.
- Transparent and fair in dealings.
- Reliable, can be trusted.



INNOVATION

We use our expertise to innovate continuously to bring more value to our offerings.

- Constantly challenge self to enhance performance.
- Identify and adopt new ideas to bring value to our customers.
- Proactively work to deliver quality.
- Possess a toolbox approach.



CUSTOMER CENTRICITY

We are aligned to focus on products, services, and processes for the best customer experience.

- Constantly innovate ways to proactively recognize and address customer matters.
- Uses customer experience and feedback to deliver excellence with agility.
- Work to enhance processes to meet and exceed customer expectations.



LEADERSHIP

We are committed and strive to be the industry leader.

- Ensure high levels of quality are maintained.
- Possess a holistic approach to give value to our offerings.
- 'Goes the extra mile' to understand and deliver customer requirements.
- Lead by example.

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OUR CULTURE

OUR CULTURE:

Acceptable Behavioral Standards:



Integrity and Honesty

Employees are expected to conduct themselves with honesty and integrity. This includes truthful representation of information, avoidance of conflicts of interest, and fair dealing in all business interactions.



Compliance with Laws and Regulations

Adherence to all applicable laws and regulations is mandatory. Employees are expected to stay informed about legal requirements relevant to their roles and responsibilities within the Company.



Conflict Resolution

Individuals are encouraged to resolve conflicts in a constructive manner. Open communication, collaboration, and seeking assistance from appropriate channels are emphasized to address and resolve conflicts promptly and professionally.



Continuous Improvement

Embracing a mindset of continuous improvement is integral. Employees are encouraged to provide constructive feedback, participate in training programs, and contribute to initiatives that enhance the overall effectiveness and ethical standards of the Company.



Respect and Inclusion

Quick Heal promotes a diverse and inclusive workplace. Employees are required to treat each other, as well as any third parties they interact with, including partners and vendors, with respect and dignity, fostering an environment free from discrimination, harassment, or bias.



Professional Conduct

Maintaining a high standard of professional conduct is essential. This includes punctuality, reliability, and a commitment to continuous learning and development to enhance individual and collective performance.



Whistleblower Protection

Quick Heal provides a mechanism for reporting concerns about unethical behavior. Individuals are protected from retaliation for reporting in good faith and are encouraged to use the available channels for reporting any violations of this Code. A formal mechanism for the same is accessible to all the Employees on the Company website.

OUR CULTURE:

Responsibilities Of Employees:**Accountability**

It is the duty of the Company and Employees to assume responsibility for their actions and decisions, including the outcomes resulting from these actions.

**Unity**

At Quick Heal, we come together as a unified family, seamlessly collaborating for mutual growth, ultimately fostering the prosperity of our Quick Heal family.

**Time Management**

Manage time effectively, ensuring timely completion of assigned tasks and projects. Communicate proactively if additional time or resources are needed.

**Excellence**

It is the unwavering pursuit of reaching the pinnacle of one's abilities, continually expanding the spectrum of one's skills to their utmost potential.

**Professional Conduct**

Conduct oneself with professionalism, integrity, and respect towards colleagues, clients, and all stakeholders.

**Brand Representation**

Represent the Company positively in all professional interactions, both online and offline as required for the role.





ADDITIONAL RESPONSIBILITIES OF SUPERVISORS & LEADERS:



Enforcement of Policies

Supervisors and leaders are responsible for enforcing the Code of Conduct and other relevant policies within their respective functions. They should take appropriate action in response to violations, ensuring that corrective measures are implemented promptly and consistently.



Training & Development

Leaders are accountable for the professional development of their team members. This includes identifying training needs, providing opportunities for skill development, and fostering a culture of continuous learning within the team.



Accessibility & Approachability

Supervisors and leaders should be approachable to their team members, creating an environment where employees feel comfortable discussing ethical concerns or seeking guidance on ethical dilemmas. They should maintain an open-door policy and be receptive to feedback.



Feedback & Improvement Initiatives

Supervisors and leaders should actively seek feedback from their teams regarding the effectiveness of the Code of Conduct and other policies. They should initiate improvement initiatives based on this feedback, fostering a culture of continuous enhancement in ethical practices.



Communication of Policies

It is the responsibility of supervisors and leaders to ensure that their team members are aware of and understand the Code of Conduct, as well as other relevant policies of the Company. They should facilitate discussions on ethical behavior and provide guidance when needed.



Performance Evaluation

Ethical conduct and adherence to the Code of Conduct should be considered in performance evaluations. Leaders should assess and recognize employees based on their commitment to ethical standards and professional behavior.



Monitoring & Addressing Workload Issues

Leaders should be vigilant about workload management within their teams, ensuring that Employees are not unduly burdened with excessive work demands. They should address workload issues promptly, promoting a healthy work-life balance.

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PRINCIPLED BUSINESS ACTIONS



Equality of Opportunity

Quick Heal provides employment opportunities to duly qualified individuals on an equal basis. The Company is an equal opportunity employer in letter and spirit and is committed to the highest standards of non-discrimination and does not unfairly discriminate against any individual for employment, regardless of the individual's race or ethnicity, color, religion, gender, age, sexual orientation, disability, marital status, or any other category protected by applicable law. The Company bases its decisions on performance, caliber, excellence, and ability at all times in order to extend its non-discrimination commitment to all stages of the employee's lifecycle at the Company.



Gifts & Hospitality

It is deemed unacceptable to engage in the act of offering, giving, or receiving gifts, including but not limited to bribes or kickbacks, facilitation payments, cash, gold or other valuable metals or gems, gifts prohibited under applicable laws, and gifts in the nature of services or non-cash benefits, which influences or appears to influence the ability to act in the best interest of Company.



Conflict of Interest

A conflict of interest occurs when an individual's personal interests, including but not limited to family, friendships, financial or social factors, could compromise his or her judgment, decisions, or actions in the workplace. Employees must ensure that any of their personal association, including close personal relationships, does not create a conflict of interest with their responsibilities at the Company or otherwise adversely affect the best interests of the Company. In the event any actual or potential conflicts of interest arise, the concerned employee must immediately report such conflicts of interest to the People and Culture Department and to the Legal Department, for necessary action and resolution.



Insider Trading

Employees are strictly prohibited from engaging in any form of insider trading or aiding others, including immediate family, friends, or business associates, in gaining any advantage from access to and possession of price-sensitive information that is not available in the public domain. This encompasses any information related to the Company, its affiliates, subsidiaries, third-party engagements (including client relationships and partner association), and any of its business operations. Any disclosure of price-sensitive information that is not publicly available will result in non-compliance with applicable insider trading laws.



Engagements outside Employment

Engaging in employment, assuming a position of responsibility, or conducting a business beyond your association with our company, whether compensated or not, may impede your capacity to perform effectively within our organization or give rise to conflicts of interest. Such endeavors must not involve any customer, supplier, distributor, or competitor of our company. Our employees are required to inform and obtain prior approval of the People & Culture Department for any such undertakings, as stipulated in the 'Conflicts of Interest' clause of this Code and in compliance with relevant company policies and laws.



Continuous Improvement

Embracing a mindset of continuous improvement is integral. Employees are encouraged to provide constructive feedback, participate in training programs, and contribute to initiatives that enhance the overall effectiveness and ethical standards of the Company.



Media Interactions

- At Quick Heal, the official spokespersons for the organization are exclusively members of the leadership team. Employees are strictly prohibited from engaging with the media or responding on behalf of the organization if approached by media representatives. This policy is in place to prevent any potential misrepresentation of company facts and to uphold and enhance the Company's reputation among stakeholders.
- Should any employee be approached by the media seeking information, whether critical or non-critical in nature, it is imperative that the employee direct the media representative or any external inquiry to the Head of the Marketing department. This measure ensures a centralized and consistent communication strategy.



Social Media Usage

- The Employees must obtain explicit authorization from the Company designated authority before posting or commenting on social media about Company-related matters not in the public domain already. However, the Employees are encouraged to share, like, engage, repost, and repurpose content from Company handles freely on their own social media platforms.
- The Employees must not disparage the Company's business partners, competitors, employees, or other personnel.
- If the Employee comes across any negative conversations or other unfavorable discussions regarding the Company, the Employee must forthwith notify any such negative activity to the Marketing Department of the Company. Further, the Employees are hereby strictly guided to refrain from commenting, nullifying, or clarifying any negative comments or situations on social media platforms on behalf of the Company.



Prohibited Drugs & Substances

The utilization of prohibited drugs and substances poses substantial safety and other associated risks within our workplaces. Possession, consumption, or distribution of prohibited drugs and substances is strictly prohibited on our premises or during the execution of company responsibilities.



SAFEGUARD COMPANY ASSETS

This clause outlines the measures and responsibilities necessary to protect the physical, intellectual, and digital assets of the Company. It aims to ensure the security, confidentiality, and integrity of company resources.



Confidential Information

We firmly assert that any confidential information, including trade secrets, encompasses a formula, practice, process, design, instrument, pattern, commercial method, or compilation of information that is neither widely known nor easily discoverable by others. It is through such proprietary knowledge that a business can gain a distinct economic advantage over its competitors or customers. Consequently, employees must refrain from sharing Quick Heal's trade secrets, confidential information, or internal data with competitors or any other third parties, including companies, firms, or business partners. Safeguarding the privacy of these trade secrets and confidential information is integral to our sustained growth and our ability to maintain a competitive edge.



Use of Company Assets

Employees are required to utilize all company assets, both tangible and intangible, including computer and communication equipment, exclusively for the purposes for which they are provided and to conduct our business. It is imperative that these assets are not subject to misuse. We are committed to minimizing the risk of fraud, misappropriation, or any form of misuse of our valuable assets.



Intellectual Property Rights

The Employees are mandated to respect and safeguard the intellectual property of the Company. While performing their roles and duties at the Company, the Employees must use the Company's intellectual property in a manner that is compliant with the guidelines issued by the Company in this regard or where such use does not infringe upon the intellectual property rights of the Company. Any intellectual property that is conceived, developed, and created by the Employees during the course of their employment with the Company automatically becomes the property of the Company. Employees are further expected to protect the confidentiality of any third-party intellectual property and data that might come into their possession. Copying or downloading of unauthorized software, trademarks, copyrighted materials, or logos constitutes an infringement of the intellectual property rights of others and is strictly prohibited.

FAIR & TRANSPARENT BUSINESS DEALINGS

The Company recognizes the importance of fairness and transparency in business to create trust and drive significant progress. By being honest, open (while also safeguarding the confidential information), straightforward, and maintaining effective communication channels across the business's various stakeholders, the Company practices fairness and transparency in all of its business dealings; thereby solidifying its business engagements. This clause underscores the Company's commitment to conducting business with fairness, integrity, and transparency. It establishes guidelines for ethical business dealings, promoting a culture of honesty, equity, and compliance with legal and regulatory standards.



Our Customers and Products

- Our commitment is unwavering in delivering products and offerings of unparalleled quality that adhere to the highest global standards.
- The products and offerings we provide will consistently align with relevant laws, encompassing aspects such as product packaging, labeling, and post-sales support obligations.
- We pledge to promote our products and offerings based on their inherent merits, refraining from any unfair or misleading statements about the offerings of our competitors.
- We commit to avoiding engagement in any activities that constitute anti-competitive behavior, including the abuse of market dominance, collusion, participation in cartels, or inappropriate exchange of information with competitors.
- We commit to conducting our interactions with customers in a professional, fair, and transparent manner.
- We acknowledge and respect our customers' right to privacy in accordance with applicable laws.



Our Partners and Suppliers

All partners and suppliers are assessed based on transparent and objective criteria, including applicable parameters such as quality, expertise, price, and delivery timelines. Any gifts or hospitality received from or given to our partners and suppliers should comply with the Company's gift and hospitality policy.



Our Financial Stakeholders

- The Company's corporate governance policies and programs, with this Code of Conduct as a pivotal component, play a crucial role in serving as a significant safeguard for shareholders.
- In recent years, governments, regulators, and authorities worldwide have implemented numerous checks and balances to foster ethical corporate behavior— which is a long-standing tradition at Quick Heal.
- Our shareholders benefit from an independent Board, consisting predominantly of independent Directors, and autonomous committees that diligently supervise audit, compensation, and governance affairs.
- Regularly revised committee charters and governance guidelines meticulously outline the roles and responsibilities of stakeholders concerned, thereby solidifying the Company's commitment to Corporate Governance principles.
- The Company ardently upholds a dedication to quality, integrity, and transparency in the disclosure of its financial reports in accordance with applicable laws. This unwavering commitment finds manifestation in the Company's time-tested policies and procedures. These encompass the diligent oversight of financial controls on a global scale by an internal audit group, empowered independent auditors with a comprehensive mandate, and the vigilant supervision of these realms by an independent Audit Committee.
- To optimize the efficacy of these invaluable resources, the Employees are anticipated to actively participate in open and forthright communication. This involves fostering a work environment conducive to the smooth exchange of information with both internal and external auditors, as well as the Audit Committee. Such collaborative engagement ensures the highest standards of accuracy, reliability, and ethical conduct in our financial reporting practices.



Political Neutrality

The Company does not aim to influence the aftermath of public elections, nor to erode or alter any system of government. Further, the Company does not give preference to any political party or candidate for political office. Any conduct on the part of Employees that implies mutual dependence or favor with any political body/ person; or utilizing Company assets, funds, and resources to support any specific political party, candidate, or campaign is strictly prohibited. If any financial contributions are considered by our Board of Directors for strengthening the democratic forces, the same shall be carried out in strict compliance with applicable laws through a transparent, non-discriminatory, and non-discretionary process.



Government Interactions

Any engagements or interactions by the Employees with the government or statutory authorities must be directed to promote good governance in a manner that is consistent with this Code. The Company does not thwart, hamper or inappropriately influence the conclusions of, or affect the integrity or availability of data or documents for any government review or investigation.





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ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG) PRACTICES



This clause articulates the Company's commitment to integrating Environmental, Social, and Governance (ESG) considerations into its business practices. The purpose is to align the company's operations with sustainable and responsible principles, contributing positively to the environment, society, and governance.



Environment

The Company is committed to minimizing its environmental impact. This includes reducing carbon emissions, conserving energy, and implementing sustainable practices in day-to-day operations.

The Company will continue striving to identify opportunities for environmental conservation and implement initiatives that contribute to the overall reduction of its ecological footprint.



Social

The Company recognizes its responsibility to contribute positively to the communities in which it operates. The Company will support social initiatives, promote diversity and inclusion, and engage in philanthropic activities that address societal challenges.

The Company deploys efforts to ensure fair labor practices, prioritize employee well-being, and foster an inclusive workplace culture.



Governance

The Company is dedicated to upholding high standards of corporate governance. This includes maintaining transparency, accountability, and integrity in all business dealings.

The Company values stakeholder input and engagement. The Company actively seeks feedback from stakeholders, including Employees, customers, investors, and the community, to inform decision-making and improve ESG practices.

The Company engages in ethical marketing and communication practices. The Company provides accurate and transparent information to stakeholders and avoids 'greenwashing' or misleading claims related to ESG efforts.





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GRIEVANCE REDRESSAL MECHANISM

The Grievance Redressal Mechanism framework establishes a structured and transparent process for addressing and resolving grievances within the Company. It aims to provide employees with a mechanism to express concerns, seek resolution, and ensure a fair and respectful workplace environment.

At Quick Heal, we place utmost importance on upholding the integrity of our workplace. Employees are strongly encouraged to promptly report any legitimate concerns or behaviors that they sincerely believe violate the Code, policies, or the applicable laws.

Should anyone identify or have good reason to suspect a breach of the Code or other applicable policies of the Company, it is mandatory to immediately bring the matter to the attention of their respective reporting manager, People & Culture department, and the Ethics Committee via **ethics@quickheal.co.in**.

We want to emphasize our commitment to a workplace free from any form of retaliation against individuals who responsibly report legitimate concerns. Any person found targeting such an individual will face disciplinary action.

If an employee suspects that he/she or someone they know has faced retaliation for raising a concern or reporting a case, we strongly encourage them to promptly contact the Ethics Committee. We stand united in ensuring a transparent, ethical, and respectful work environment for all.

The Ethics Committee shall conduct a timely inquiry of any complaints received regarding violation of the Code; provide an opportunity to the complainant as well as a respondent to represent their case and explanations/reasoning thereto; study the particulars to deal with such complaint in a fair, impartial, independent, and lawful manner; and pronounce its findings/decision. The findings/decision of the Ethics Committee shall be final and binding; and the same shall be duly signed -off in writing by the complainant and respondent. The inquiry proceedings convened by the Ethics Committee will be 'minuted' for records of the Ethics Committee.



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