

**ADKAMP** | MEDIA  
MARKETING &  
MORE...

**CODE OF CONDUCT  
&  
ETHICS**

# ADKAMP's Code of Conduct & Ethics

ADKAMP is providing model code of conduct to its employees and all stakeholders including consultants and vendors to assist them in their corporate compliance efforts

Please remember that a Code of conduct and Ethics is just one part of an effective corporate compliance program. The information provided in this model code is not legal advice and should not be construed as such

Our Code of Conduct sets forth our core values, shared responsibilities, global commitments, and promises. This COC document provides general guidance about the Company's expectations, highlights situations that may require particular attention, and references additional resources and channels of communication available to us. It is also the first step for you to get clarity on any questions relating to ethical conduct. Our Code, however, cannot possibly address every situation we face at work. Therefore, the Code is by no means a substitute for the foundation pillars of ADKAMP. We must remember that each of us is responsible for our own actions and that the ethical choice is always the best choice. Please review the entire Code and refer to it whenever you have a question on ethical conduct. As an annual process, you will be asked to confirm in writing that you have reviewed the Code, and understand and agree to adhere to our core values, shared responsibilities, global commitments, and promises.

This Code of Conduct is also available on our Company website at :  
<http://www.adkamp.com/about-us/corporate-governance/Documents/CodeofConduct.pdf>.

# Message from Founders

ADKAMP is proud of its reputation as an organisation that strongly values, integrity, truthfulness and harmony.

This reputation enabled us to reach newer heights in its industry space, Using our creativity and ideological potential, we offer clients complete marketing solutions that are not only visually beautiful, but also ensure that your target customers get to see and experience. Also maintain the confidence of all stakeholders (internal as well external).

ADKAMP's general code of conduct and ethics outlines the general ethical standards that all of our employees and stakeholders live by. While this code does not address all the ethical concerns that you may face during your employment/association with us, we hope it will give you the information you may need to make ethical decisions on a daily basis. And we also feel that you will be comfortable asking for guidance whenever you need help.

Thank you for living and driving ADKAMP in its commitment to a positive workplace that sets examples of excellence for our employees and affiliates

Sincerely,

**Pritish** Asthana  
CEO

# Introduction of Code of Conduct and Ethics

This Code of Conduct & Ethics ("Code") details ADKAMP 's (Which is a part of LITAM Advisory Services Private Limited) policies for employees and other stakeholders. ADKAMP is committed to a quality business and reputation that values integrity, respect and truthfulness, and a strong commitment to the highest ethical standards. These principles apply to employee interactions with customers, co-workers, vendors, government and regulatory agencies and the general public. This Code applies to all entities under the umbrella of LITAM Advisory Services Group like ADKAMP, their respective Board of Directors, and employees (collectively "employees"), consultants and other stakeholders. ADKAMP 's employees must be familiar with this Code and adhere to its guidelines.

This Code is not a comprehensive guide of all ethical issues that employees may face, but merely highlights specific problems. 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 questions, please contact Head of HR Function. This policy may be modified or updated at any time. ADKAMP welcomes employee suggestions on changes in this Code.

# Our Values

Our values are the principles we use to run the Company on a daily basis. They are so important that they are the source of our entire Code — a sort of ethical backbone. They are clear and simple. Our values are the foundation of everything we do and they are encapsulated in the acronym 5Ps of **ADKAMP**

Our values are also influenced by the principle of stakeholders of growth. As **ADKAMPER**, we are all stakeholders of the company's legacy — its resources, assets and opportunities. As trustees, we have an obligation to pass on a better, stronger **ADKAMP** than the one we received. By necessity this includes meeting or exceeding our commitments to other stakeholders, developing the full potential of our people, and building **ADKAMP's** reputation to make it one of the trusted and respected brands.

## PERSPECTIVE

Our Perspective is to make consumers listen to brands and vice-versa, through amazing designs, content, campaigns & commercials

## PEOPLE

People Oriented organization, leveraging leadership in its people to set standards in our business & transactions & be an exemplar for the industry & ourselves.

## PROBITY

To be ethical, sincere and open in all our transactions.

## PROCESS

To adhere objective and transaction-oriented processes, and thereby earn trust and respect.

## PRODUCTIVITY

To strive relentlessly, constantly improve ourselves, our teams, our services & products to become the best.

The Code of Conduct expresses ADKAMP's commitment to conducting business ethically. It explains what it means to act with integrity and transparency in everything we do and in accordance with our unique culture and values.

As members of the ADKAMP family, let us follow not only the letter of the Code, but its intent and spirit as well. This means we should:

- Understand the areas covered by the Code, Company policies and procedures, and laws that apply to our job.
- Follow the legal requirements of all locations where we do business.
- Conduct ourselves in ways that are consistent with the Code, Company policies and procedures, and laws.
- Speak up if we have concerns or suspect violations of the Code, Company policies and procedures, or laws.
- When requested, certify that we have reviewed, understand and agree to follow the Code.
- Understand that following the Code is a mandatory part of our job.

# THE CODE

IS MORE THAN  
JUST WORDS FOR  
ADKAMPERS

The Code cannot address every situation that may occur. We are expected to exercise good judgment and ask questions when we need guidance or clarification. Many resources are available to assist us. These include our managers, Human Resources, the Helpline, management and other resources listed at the end of the Code. In addition to the Code, we should also be aware of all Company policies and procedures applicable to our work. You may refer to the [Policy Portal](#) which is a repository of all our policies.

# What are my responsibilities?

## I FOLLOW THE CODE

Our Code applies equally to all **ADKAMPERS** directors, officers and employees globally, across verticals. The Code also applies to our partners, suppliers, agents or others acting on the Company's behalf. As employees, it is important that we know and follow the Code as a guideline for decision-making that is paired with integrity.

## I LEAD BY EXAMPLE

No matter what our role is, each one of us is expected to lead when it is a question of ethics and be accountable for our actions. We act with responsibility and integrity in tune with our 5Ps of **ADKAMP** values.

## I AM THE EXAMPLE FOR MY TEAM

Most often, a manager is the first person to be contacted about a concern in our work environment. Managers have some specific responsibilities:

- Be a role model of ethical behavior.
- Encourage your team to raise issues and speak up.
- Communicate a positive message about your commitment to ethics & compliance.
- Promote our values, the Code of Conduct & compliance with policies & the law.
- Actively support ethics and compliance awareness and training programs.
- Have open avenues for communication.
- Listen and respond fairly to employee concerns.
- Find satisfactory and complete resolutions to ethical issues.
- Escalate concerns when additional assistance is needed.

**ADKAMPs'** non-retaliation policy is an embodiment of our values and a cornerstone of our Code. If you observe violations of **ADKAMP's** values and principles, you are encouraged to report such incidents to the Helpline or directly to Management. **ADKAMP** will protect you and ensure that you are not retaliated against because of any report that you raise in good faith. **ADKAMP** does not tolerate any form of retaliation (whether by a manager, co-worker or otherwise) against an individual because he or she made a good faith report of an integrity concern. This protection also extends to anyone who assists with or cooperates in an investigation or report of an integrity concern or question. We support those who support our values.

# Compliance with applicable laws & regulations

ADKAMP believes and practice to observe all laws, 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 accrediting agencies, as well as other state and federal laws. If federal, state or local law exists that is either contradictory or stricter than this policy, the employees must apply the law

## ADMISSION PROCESS

**Business Communications** : Employees must avoid public statement regarding issues or Matters of ADKAMP about which they are not authorized spokesperson

**Advertising and Marketing** : ADKAMP's policy takes necessary steps to assure that all advertised products or services in any of its literature, exhibit of other public statements is true, supported by documentation, and does not mislead customers and any other respective authority

# Conflict of Interest

ADKAMP employees and associates on contract must avoid having a personal, business, financial, or other interest, activity or relationship, outside ADKAMP that has or may be in conflict with ADKAMP or its customers. Any material transaction or relationship that may give rise to an actual or perceived conflict of interest should be discussed with Your Vertical Heads or Management Team

Conflict of Interest may include, but are 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 does business with **ADKAMP** without appropriate approval from Management

**Accepting loans of Gifts** of entertainment, food, or cash of high value (say of INR 1000 or more) from vendors, subordinate employees, regulatory or any outside concern that does or seeks to do business with or is a competitor to **ADKAMP**

Obtaining a personal financial benefit in any sale or loan of company property

Performing services of customers outside those consistence with **ADKAMP**'s mission of providing highest quality of services and products.

Using or disclosing any confidential information gained during employment for an employee's personal benefit or benefit of others including a future employer

# Employment Practices

All employees of ADKAMP shall follow and render the below stated practices

## Discrimination and Harassment :

oADKAMP prohibits discrimination of customers, vendors or employees whether or not the incidents occur on ADKAMP's premise and whether or not the incident occur during business hours

oADKAMP follows Federal, state and local laws to ensure equal opportunity, employment, compensation, development and advancement prospects for all qualified individuals and prohibits deliberate harassment based on federally protected categories of race, color, religion, sex, national origin, age, or disability

o**Workplace Violence** : ADKAMP does not tolerate workplace violence including threats, threatening behavior, harassment,, intimidation, assaults, abusive language or similar conduct

o**Weapons Policy** : ADKAMP employees should not carry fire arms or other weapons On ADKAMP premises

o**Illegal Drugs & Alcohol Policy** : ADKAMP employees must not distribute, posses or use illegal or unauthorized drugs or alcohol on ADKAMP's property or in connection with ADKAMP's business

# Books and Records

**Accurate and complete Business Records:** ADKAMP employees must act in good faith not to misrepresent material facts in ADKAMP's books and records or in any internal or external correspondence, memoranda, or communication of any type including telephone or electronic communications

**Financial Reporting :** All ADKAMP funds, assets, liabilities and receipts must be recorded in accordance with generally acceptable accounting procedures. There can not be any "off the books" accounts

**Proper Maintained of Records :** ADKAMP maintain documents in accordance with all applicable laws and regulations. If ADKAMP's employees receive a subpoena or summon, a request for records or all other legal papers or if we have reason to believe that such a request or demand is likely, the law requires ADKAMP to retain all relevant records then contact the Head of Finance function

**Cooperation with Auditors :** ADKAMP's employees must cooperate fully with internal and outside auditors during examination of ADKAMP's books, records and operations

# Use of Company sources

For a comprehensive description of **ADKAMP** 's policy on use of company resources, please see the respective policies like IT Policy, Mobile policy etc.

## Internet and Electronic Mail Policy

Employees may use Internet and send and receive electronic mail solely for business purposes from the email addresses provided to them. Any business related email should not be written through a personal email outside **ADKAMP**'s domain

**ADKAMP** 's electronic mail system is a company resource, and **ADKAMP** 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.

**Equipment and Supplies-** All equipment and supplies purchased by **ADKAMP** remain **ADKAMP** 's property, including but not limited to office supplies, office furniture, Air Conditioners machines, computers, software, hardware, supplies and equipment, and should not be used for personal reasons.

**Non – Work related Interests :** **ADKAMP**'s employees should not use **ADKAMP**'s facilities to promote non- **ADKAMP** or non-work related interests of the employees or of third parties without prior consent of Supervisor

**Political Activities :** **ADKAMP** encourages employees to participate in political process on their own time. Employees should not use **ADKAMP** resources, assets or reputation to support a political candidate.

**Proper use of Organizational Assets :** **ADKAMP** employee should only use, transfer or dispose of funds and assets for the lawful and legitimate business purposes for which they were approved by their respective Head of the Department or the Management

# Privacy and Confidentiality

**Confidential Information :** **ADKAMP** employees must exercise care to avoid disclosing non-public, internal, secret, or proprietary information related to **ADKAMP** or its customers/vendors to unauthorized persons, either within or outside ADKAMP during employment or afterwards, except as such disclosure is legally mandated or approved by **ADKAMP Management**.

**Employee Access to Confidential Information-**Only **ADKAMP** 's employees that truly need to know confidential information to conduct their business have access to confidential information and must take necessary steps to keep this information private and confidential.

**Confidential Information of Employees-** Employment and medical records of **ADKAMP** 's employees are confidential and private. Medical Records may only be disclosed if the employee provides a written release required by applicable law.

**Financial Information of Current and Former Vendors/Customers** must be protected as required by privacy laws and regulations.

# Resources

## Contact Information

- ADKAMP's Human Resource Department
- Ombudsman, if applicable
- 24 Hour Employee Hotline, if applicable
- Legal Department / General Counsel
- Outside Counsel (if assigned)
- Company – wide representative in case of subsidiaries / associate / Joint Ventures Companies / Firms or partners

## **ZERO-TOLERANCE POLICY TOWARD VIOLATIONS OF THE CODE:**

ADKAMP 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 or retaliated against whistleblowers will have their employment with ADKAMP terminated

# Reporting actual or suspended violations of the code

**Requirement to Report Actual or Suspended Violations of the Code :** ADKAMP employees must report any actual or suspended violations of this code to the Head of Human Resources or Head of Legal Function of ADKAMP, failure to report any actual or suspected violations of the code is in itself a violation of this code.

**Non Retaliation Policy** –Employees of will not be retaliated against or Subject to any form of reprisal for raising a good faith concern under this policy or participating in an investigation in to any such concerns. Retaliation is a serious violation of this Code of Conduct and it should be reported immediately

**Investigation of Alleged Violations 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, ADKAMP encourages you to seek advice from Head of HR Function before acting.

**Hotline - (if applicable)-** ADKAMP has established a toll-free Company hotline. If you have any question or concern, you may call the employee hotline on any working days. Your question will be considered confidentially.