

Code of Conduct Policy

PELATRO LIMITED

Overview of our policies

Policies

- Pelatro code of ethics and business conduct
- Pelatro Corporate Communications Policy
- Pelatro Customer interaction code of conduct
- Data protection policy
- Protection of assets policy
- Software compliance policy

Applicability

These policies are applicable to Pelatro Limited and its affiliates all over the world (“Pelatro”)

Who must follow Pelatro Policies?

Our policies apply to all employees of Pelatro (“Employees”) throughout the world. All Employees should ensure that others representing Pelatro such as consultants, agents and independent contractors- agree to follow applicable Pelatro policies.

Responsibility of all Employees

1. Have a basic understanding of all applicable policies
2. Seek assistance from your manager, legal counsel or other resources when you have questions about the application of the policies
3. Promptly report any concerns that you or others may have about possible violations of Pelatro policy

Consequences of violation

Violations of these policies are subject to disciplinary action up to and including discharge from employment and, subject to applicable law, recovery damages. In addition, many Pelatro policies reflect requirements of applicable law. Violations of applicable law may subject the violating individual (and Pelatro) to civil and criminal penalties. Pelatro’s policy is to fully cooperate in governmental investigations of individual’s alleged wrongdoings.

I. Pelatro Code of Ethics and Business Conduct

Pelatro believes that a key ingredient to achieving success in business is the requirement that all Employees conduct themselves with basic honesty and integrity, in their interactions with the company, colleagues, customers, business partners, vendors and others. Ethical conduct is a core value at Pelatro. Our customers respect and admire us for the high standards we have set for ourselves in terms of the way we conduct ourselves in every business relationship. We count on Employees to maintain and enhance that reputation. This Code of Business Conduct provides the guidelines for the essential comprehension and understanding of the responsibilities and obligations to comply with the law and these standards, and to provide feedback to the management of Pelatro on anything that is not in compliance with the law or these standards.

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1. Introduction

This Code of Business Conduct has been issued by Pelatro to deter wrong doing and to promote:

1. Ethical and honest conduct by Pelatro's Board of Directors and Employees, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
2. Avoidance of conflicts of interest, including disclosure to an appropriate person of any material transaction or relationship that reasonably could be expected to give rise to such a conflict.
3. Full, fair, accurate, timely, and understandable disclosure in reports and documents that Pelatro files with, or submits to the Regulatory Bodies, its shareholders and in other public communications made by Pelatro.
4. Compliance with all other applicable laws, rules, and regulations.
5. Prompt internal reporting of any violations of this Code of Business Conduct.
6. Accountability for adherence to the Code of Business Conduct.

Pelatro expects all Directors and Employees worldwide to comply with the following standards of business conduct. Pelatro is committed to take prompt and impartial action against violations of these policies. Violation of the standards outlined in these guidelines may be grounds for disciplinary action up to and including termination of employment or other business relationship. Employees and directors who are aware of any misconduct, illegal activities, fraud, abuse of Pelatro's assets or violations of the standards outlined in these guidelines are responsible for reporting such matters.

2. Requisite Obligations

Pelatro's standards expect from Employees, the following shared responsibilities. It is your responsibility to;

1. Conduct Pelatro's business in compliance with, applicable laws, rules and regulations and Pelatro's policies, including this Code of Business Conduct
2. Treat all Employees, customers and business partners in an honest and fair manner
3. Avoid situations where your personal interests are in conflict with that of Pelatro's

4. Proper use of Pelatro's proprietary and confidential information, assets and resources, as well as those of Pelatro's customers and business partners.
5. Raise any concern that you or others may have about possible violations of this Code of Business Conduct, laws or the Company's policies. You may,
 - a) Raise your concerns with your manager, or
 - b) Raise your concerns with company's Compliance Officer
6. Employee's are obliged to familiarise themselves with security and business continuity policies, procedures and plans as these relate to Pelatro's core business and the businesses of the customers that Pelatro supports.

Individuals have a role to play in compliance to security and business continuity requirements and failure to so do can result in disciplinary action.

3. Specific Obligations

a) Policy against Retaliation

Pelatro prohibits any director or Employee from retaliating or taking adverse action against anyone for raising suspected conduct violations or helping to resolve a conduct concern. Any individual who has been found to have engaged in retaliation against a person for raising, in good faith, a conduct concern or for participating in the investigation of such a concern may be subject to discipline, up to and including termination of employment or other business relationship. If any individual believes he or she has been subjected to such retaliation, that person is encouraged to report the situation as soon as possible to their reporting manager, Pelatro's Compliance Officer

b) Equal opportunities employer

Pelatro is committed to equal employment opportunities, a basic goal of free society. By continuing to extend equal opportunity and provide fair treatment to all employees on the basis of merit, we will improve Pelatro's success while enhancing the progress of individuals and the communities where our businesses are located.

Pelatro will

- Use merit, qualifications and job related criteria as sole bases for all employment-related decisions affecting employees.
- Recruit, hire, train, compensate, promote and provide other conditions of employment without regard to a person's race, colour, religion, national origin, sex, age disability, veteran status
- or other characteristic protected by law.
- Provide a work free environment free of harassment of any kind based on diverse human characteristics and cultural back grounds.

c) Work Environment

The Pelatro work environment must be free from discrimination and harassment based on race, caste, creed, religion, gender, sexual orientation, age, national origin, disability, marital status, or other factors that are not related to Pelatro's business interests. Other activities that are prohibited because they are not conducive to a good work environment include,

- a. Physical harm or threats of physical harm
- b. Violent behavior
- c. Possession of weapons of any type
- d. Use, distribution, sale, or possession on Pelatro's premises of illegal drugs or any other controlled substance, except medicines for approved medical purposes.
- e. Consumption of alcohol on Pelatro premises when not at a company sponsored function
- f. Sexual Harassment

Sexual harassment is defined as any form of conduct that a prudent person would find offensive - whether physical (direct or indirect), verbal (express or implied) or environmental. It includes unwelcome sexual advances, requests for sexual favours and other verbal or physical conduct of a sexual nature when one of the following applies.

- Submission to such conduct is made either explicitly or implicitly - term or condition for an individual's career growth or opportunities.
- Submission to or rejection of such conduct by an individual is used as the basis for decisions affecting that individual's career and feelings.
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or of creating an intimidating, hostile or offensive working environment.

The concept of sexual harassment is extremely broad, covering anything that a person who is not hypersensitive finds it offensive – words, magazine pictures, messages, conduct, touching or looking. There are two forms of sexual harassment viz., quid pro quo (one thing in return for another) and hostile environment. Quid pro quo harassment is the exchange of sexual favours for career benefits.

The following three elements must exist for the complainant to be successful.

- Complainant was subjected to unwelcome sexual harassment in the form of sexual advances or requests for sexual favours.
- Harassment complained of was based on sex.
- Submission to the unwelcome advances was an express or implied condition for receiving some form of career benefits, or refusal to submit to sexual demands resulted in a tangible job detriment.

Hostile environment is the creation of an offensive working environment. The fact that the victim voluntarily submitted to the harassment is not a defense and the issue is whether the conduct was welcome or unwelcome.

d) Conflicts of Interest

Employees may take part in legitimate financial, business and other activities outside their jobs. Those activities, however, must be free of conflicts with their duties and responsibilities at Pelatro. A "conflict of interest" may occur when an individual's private interest interferes/ appears to interfere, in any way with the interests of the company as a whole. A conflict situation may arise when an Employee takes action or has interests that may make it difficult to perform his or her company work objectively and effectively, or that interfere with that person's judgment in the course of his or her job at Pelatro. Conflicts of interest may also arise when an employee, or a member of his or her family, receives improper personal benefits as a result of his or her position in the company.

e) Confidentiality

You are permitted to use and disclose proprietary and/or confidential information only as authorized and in accordance of Pelatro's business. In addition, you are responsible for making use of adequate safeguards to prevent the disclosure or loss of proprietary and/ or confidential information. Such confidential information should be stored only on computers or storage media owned or maintained by Pelatro. Such confidential information should not be downloaded to or stored on an employee's personal computer or removable media.

Confidential information includes all non-public information that might be of use to competitors, or harmful to the company or its customers, if disclosed. An Employee must also maintain the confidentiality of third party information that Pelatro has agreed to maintain confidential to the extent of any such confidentiality or nondisclosure agreement. An Employee's obligation to protect Pelatro proprietary and confidential information exists whether or not the information is explicitly labeled or otherwise designated as being proprietary or confidential, and the obligation continues even after leaving the company.

One of Pelatro's most valuable assets is its intellectual property - patents, trademarks, copyrights and other proprietary information. It is Pelatro's policy to establish, protect, maintain and defend its rights in all commercially significant intellectual property and to use those rights in responsible ways. You must take steps to safeguard these assets regardless of whether they are labeled as proprietary or confidential, contain a copyright notice, or otherwise are explicitly designated as constituting important intellectual property of the Company.

In addition to protecting Pelatro's intellectual property rights, Pelatro respects the intellectual property rights of others. Unauthorized use of the intellectual property rights of others may expose Pelatro to liability. To avoid the risk of misusing a third party's confidential information (such as information from customers, vendors, service providers or business partners), you must not, directly or indirectly, loan, copy, download or distribute such information or disclose such information to any unauthorized persons (whether or not employed by Pelatro) unless you do so in accordance with the terms that have been formally agreed to by Pelatro and such third party. To avoid violating the law and/or licensing requirements of third parties, as well as to minimize the risk of computer viruses, you should take special care when acquiring software (which includes computer programs, databases and related documentation) from third parties. This applies both to purchased software and to software that is made available without charge, via the Internet. The terms and conditions of software license agreements – such as provisions not to copy or distribute programs - must be reviewed and followed. In no event should you copy any such software, especially any software constituting "open source code" into any development work you do for Pelatro unless Pelatro permits such usage explicitly.

f) Conducting Pelatro's Business

- a. Never make oral or written misrepresentations or dishonest or misleading statements to anyone.
- b. Never make false entries in Pelatro's business records. It is your responsibility to ensure that any documentation or report that you submit or approve - such as a customer order, financial information, an expense report or time slip - is complete, accurate and contains the proper signatures. Employees who are found to have knowingly submitted or approved any documentation, report or other information containing materially inaccurate, materially

incomplete or other improper data or unauthorized signatures are subject to disciplinary measures, up to and including termination.

- c. Have all commitments to customers and agreements, whether verbal or written, reviewed and approved in accordance with company policies and procedures.
- d. Information about other companies and organizations, including competitors, must be gathered using appropriate methods. Illegal practices such as trespassing, burglary, misrepresentation, wiretapping and stealing are prohibited. In addition, you should not solicit or knowingly accept confidential data from a competitor's employees, ex-employees or customers.
- e. Pelatro does not permit bribes, kickbacks or any other illegal or improper payments, transfers or receipts. This prohibition is across-the-board and applies to both giving and receiving. No employee shall offer, give, solicit or receive any money or anything else of value for the purpose of obtaining, retaining or directing business or bestowing or receiving any kind of favoured treatment.

g) Business Entertainment and Gifts

Pelatro does not permit bribes, speed money, kickbacks or any other illegal or improper payments, transfers or receipts. This prohibition is across-the-board and applies to both giving and receiving. No Employee shall offer, give, solicit or receive any money or anything else of value for the purpose of obtaining, retaining or directing business or bestowing or receiving any kind of favoured treatment.

Appropriate care should be exercised to ensure that business entertainment and gifts for customers, prospective customers, public officials, vendors and others are not excessive and cannot reasonably be construed as bribes or improper inducements. No business entertainment or gift should exceed the bounds of good taste or customary business standards in the community involved. All business entertainment and gifts should be kept at a reasonable level and be based on the expectation that they will become publicly known. All funds expended for business entertainment and gifts must be fully documented and reflected in the books of Pelatro. Employees must refrain from requesting, directly or indirectly, that they be given business gifts, entertainment or favours by anyone with whom Pelatro does business. When such gifts, entertainment or favours are offered to Employees, they may be accepted only in the event they do not exceed the bounds of good taste or customary business standards in the community involved. Acceptance should be based on the expectation that it will become publicly known. Cash in any amount or cash equivalents (such as gift certificates) shall not be accepted by any employee.

“Prizes from clients and customers: In certain specific cases, for commendable contribution by the Employees where the client / customers voluntarily wishes to recognize directly, the onus is on the Employee to inform his/her regional HR and reporting manager prior to receiving any such prizes for our records else it will be seen as non-adherence which may lead to a possible disciplinary action up to termination”.

h) Non-Solicitation and Non-Compete

Employees are prohibited from directly or indirectly, soliciting any Pelatro customers, prospective customers, vendors or any employees of Pelatro during and after expiration or termination of Employees employment with Pelatro. Employees are also prohibited from directly or indirectly

entering into employment of, or render any services to, any person, firm or corporation engaged in any business competitive with the business of Pelatro or any of its subsidiaries or affiliates or engaged in such business on his own account or become interested in any such business, directly or indirectly as an individual, partner, shareholder, director, officer, principal, agent, employee, trustee, consultant, or any other relationship or capacity, provided, however, that nothing contained in this clause shall be deemed to prohibit Employees from acquiring, solely as an investment, shares of any publicly listed/traded company.

4. Compliance with laws

Pelatro will and expects Employees to comply with all applicable rules and regulations while conducting business.

5. Disciplinary Process and Committee

This procedure is designed to help and encourage all Employee's to achieve and maintain standards of conduct.

6. Whistle-Blowing Policy and Committees

Pelatro has formed this committee to ensure adherence to this code and to report any violations.

II. The Duties of Independent Directors

The independent directors shall—

- (1) Undertake appropriate induction and regularly update and refresh their skills, knowledge and familiarity with the company;
- (2) Seek appropriate clarification or amplification of information and, where necessary, take and follow appropriate professional advice and opinion of outside experts at the expense of the company;
- (3) Strive to attend all meetings of the Board of Directors and of the Board committees of which he/she is a member;
- (4) Participate constructively and actively in the committees of the Board in which they are chairpersons or members;
- (5) Strive to attend the general meetings of the company;
- (6) Where they have concerns about the running of the company or a proposed action, ensure that these are addressed by the Board and, to the extent that they are not resolved, insist that their concerns are recorded in the minutes of the Board meeting;
- (7) keep themselves well informed about the company and the external environment in which it operates;

- (8) Not to unfairly obstruct the functioning of an otherwise proper Board or committee of the Board;
- (9) Pay sufficient attention and ensure that adequate deliberations are held before approving related party transactions and assure themselves that the same are in the interest of the company;
- (10) Ascertain and ensure that the company has an adequate and functional vigil mechanism and to ensure that the interests of a person who uses such mechanism are not prejudicially affected on account of such use;
- (11) Report concerns about unethical behaviour, actual or suspected fraud or
- (12) violation of the company's code of conduct or ethics policy;
- (13) Acting within his/her authority, assist in protecting the legitimate interests of the company, shareholders and its employees;
- (14) not disclose confidential information, including commercial secrets, technologies, advertising and sales promotion plans, unpublished price sensitive information, unless such disclosure is expressly approved by the Board or required by law.

Further, the Independent Directors of the Company shall abide By the relevant rules, regulations and provisions of the respective countries corporate governance.

The Board of Directors may stipulate further guidelines, procedures and rules, from time to time, to give effect to the intent of this code, and to further the objective of good corporate governance.

Terms of Appointment

Manner of appointment:

1. Appointment process of Independent Directors shall be independent of the Company management; while selecting Independent Directors the Board shall ensure that there is appropriate balance of skills, experience and knowledge in the Board so as to enable the Board to discharge its functions and duties effectively.
2. The appointment of independent director(s) of the Company shall be approved at the meeting of the shareholders.
3. The explanatory statement attached to the notice of the meeting for approving the appointment of independent director shall include a statement that in the opinion of the Board, the independent director proposed to be appointed fulfills the conditions specified in the Companies Act, 2013 and the Rules made thereunder and that the proposed director is independent of the management.
4. The appointment of Independent Directors shall be formalized through a letter of appointment, which shall set out:
 - a. the term of appointment;
 - b. the expectation of the Board from the appointed director, the Board-level committee(s) in which the director is expected to serve and its tasks;

- c. the fiduciary duties that come with such an appointment along with accompanying liabilities;
 - d. provision for Directors and Officers (D & O) insurance, if any;
 - e. the Code of Business Ethics that the Company expects its directors and employees to follow;
 - f. the list of actions that a director should not do while functioning as such in the Company; and
 - g. the remuneration, mentioning periodic fees, reimbursement of expense for participation in the Board and other meetings and profit related commission, if any.
5. The terms and conditions of appointment of Independent Directors shall be open for inspection at the registered office of the Company by any member during normal business hours.
 6. The letter of appointment along with the detailed profile of Independent Directors shall also be posted on the Company's website and stock exchange not later than one working day from the date of such appointment.

Maximum tenure of Independent Directors

An independent director shall hold office for a term up to five consecutive years on the Board of the Company and shall be eligible for reappointment for another term of up to five consecutive years on passing of a special resolution by the Company.

Independent director, who completes his term as aforesaid, shall be eligible for appointment as independent director in the Company only after expiry of three years of him ceasing to be an independent director in the Company provided that such independent director shall not, during the said period of three years, be appointed in or be associated with the Company in any other capacity, either directly or indirectly.

Re-appointment:

The re-appointment of independent director shall be on the basis of report of performance evaluation.

Resignation or removal:

1. The resignation or removal of an independent director shall be in the same manner as is provided in Sections 168 and 169 of the Companies Act, 2013 and the Rules made thereunder.
2. An independent director who resigns or is removed from the Board of the Company shall be replaced by a new independent director within a period of three months from the date of such resignation or removal, as the case may be.
3. Where the Company fulfils the requirement of independent directors in its Board even without filling the vacancy created by such resignation or removal, as the case may be, the requirement of replacement by a new independent director shall not apply.

Separate meetings:

1. The Independent Directors of the Company shall hold at least one meeting in a financial year, without the attendance of non-Independent Directors and members of management;
2. All the Independent Directors of the Company shall strive to be present at such meeting.
3. The meeting shall:

- a. review the performance of non-independent directors and the Board as a whole;
- b. review the performance of the Chairperson of the Company, taking into account the views of executive directors and non-executive directors;
- c. assess the quality, quantity and timeliness of flow of information between the Company management and the Board that is necessary for the Board to effectively and reasonably perform their duties.

Limit on number of directorships

1. A person shall not serve as an independent director in more than seven listed companies.
2. Further, any person who is serving as a whole-time director in any listed company shall serve as an independent director in not more than three listed companies.

Evaluation mechanism:

1. Evaluation Criteria shall be laid down by the Nomination & Remuneration Committee. The same shall be disclosed in the Annual Report.
2. The performance evaluation of Independent Directors shall be done by the entire Board of Directors, excluding the director being evaluated.
3. On the basis of the report of performance evaluation, it shall be determined whether to extend or continue the term of appointment of the independent director.

III. Pelatro Corporate Communications Policy

This policy describes the basic principles of conduct that we share as Employees. This Code also applies to Pelatro's Directors. This Code is intended to provide a broad overview of basic ethical principles that guide our conduct. In some circumstances, we maintain more specific policies on the topics referred to in this Code.

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Annexure 1: Contact details

Pelatro discloses information about its operations and performance to accommodate the mutual interests of Pelatro and all stakeholders . Pelatro supports regular communication with Employees, shareholders, customers, communities, media and other groups that have an interest in the company.

The Pelatro Communications Policy (SCP) defines areas of responsibility and requirements for material and non-material communication.

A. Responsibilities

I. Corporate Communications Department is responsible for:

- Effective communication with employees, customers, industry, trade media and other parties with an interest in the company.
- Reviewing information prior to public disclosure for materiality (see Section B). If information is believed to be potentially material, it must be referred to Investor Relations for review.

II. Employees are responsible for directing information requests to the Corporate Communications Department within Pelatro as detailed in the following sections.

B. Definitions

"Material" Information - Information is material if there is a substantial likelihood that a reasonable shareholder would consider it important in making an investment decision. Earnings information and "guidance" regarding earnings forecasts should both be considered as being material. Earnings guidance includes indications that earnings are "up," "down," or "flat," along with such statements as "I would not be troubled by that," "that sounds about right," and "that's in the ballpark." Other types of information or events that Regulatory Bodies have indicated are likely to be considered material include (but are not limited to) the following:

- mergers, acquisitions, tender offers, joint ventures or changes in assets; default on debt obligations;
- new products, discoveries, orders, or developments regarding customers or suppliers, such as the acquisition or loss of a contract;
- changes in control or in management;
- a change in Auditors, Directors, Chief Financial Officer, Chief Executive officer and Company Secretary
- events regarding the issuer's securities, such as calls of securities for redemption, repurchase plans, stock splits or changes in dividends, changes in the rights of security holders, public or private sales of additional securities by the issuer;

- Bankruptcies, insolvency or other significant liquidity events; and litigation.

"Non-public" Information - Any information that has not been disseminated in a manner reasonably designed to make it generally available in the public domain.

"Proprietary" information - Any information that, if disclosed, would harm Pelatro competitive advantage

C. Disclosure Policy

Pelatro is committed to providing timely and accurate information to the various stakeholders, consistent with legal and regulatory requirements. When releasing material information, it is imperative that consistent disclosure practices be applied, and that all members of the investment community, including individual investors, have prompt and simultaneous access to the disclosed information. The Disclosure Policy applies to all Employees and all of its subsidiaries and members of the Board of Directors. It covers disclosures in documents filed with Regulatory Bodies and written statements made in Pelatro annual reports, news and earnings releases, letters to shareholders, speeches by senior management and information provided by Pelatro on its Internet Web site. In addition, it covers oral statements made in group and individual meetings with analysts and investors, phone calls and webcasts with analysts and investors, and interviews with the media as well as press conferences and all other communications of material information reasonably likely to be transmitted directly or indirectly to the public.

Under this policy, the Primary Spokespersons for Pelatro are mentioned in Annexure 1. Others within Pelatro, including those persons designated from time to time by a Primary Spokesperson, will serve as Authorized Spokespersons for a specific period of time/ specific communication, to speak on behalf of Pelatro or to respond to specific inquiries from the investment community, financial media or the general media. No one but a Primary or Authorized Spokesperson is authorized to talk to investors/ investment community/ analysts/ financial media/ general media. All inquiries from such sources must immediately be referred to the Corporate Communications Department.

Responding to inquiries

Employees (other than the Primary or Authorized Spokespersons) are not authorized to respond under any circumstances to inquiries from investors/ investment community/ analysts/ financial media/ general media unless specifically authorized to do so by a Primary Spokesperson. Employees are instructed to refer all such inquiries to the Corporate Communications Department.

Prohibition on selective disclosure

Pelatro, its directors, executive officers, investor relations personnel, and other people with similar functions, are prohibited from selectively disclosing material non public corporate information to securities market professionals and holders of the issuer's securities, as well as potential investors or anyone else that is not subject to a confidentiality agreement or possesses another duty against disclosing such information.

Methods for public disclosure of material information - Pelatro will disseminate material information through an appropriate Regulatory Body filing and, in addition, if deemed appropriate, another method of disclosure that is reasonably designed to provide broad, non-exclusionary distribution of the information to the public. All news releases or other material written public disclosures will be made available on Pelatro Web site. Pelatro will publicly disseminate the information before making that information available on a selective basis to the investment community, such as analysts and institutional investors or holders of Pelatro shares, or any other member of the public.

Inadvertent disclosures

Inadvertent material disclosures are required to be reported promptly to a primary spokesperson for Pelatro.

D. Dissemination of non-public information to Employees

During the course of normal business activities, material or proprietary information will need to be shared among Employees. Discretion should always be exercised to limit such information to only those who need to know as part of their job responsibilities. When disseminating such information, it is important to reiterate its confidential nature and take steps to ensure that this information will be protected from misuse or improper release.

E. Publishing of news about Pelatro

All news releases to be distributed are to be reviewed and approved in advance by the Corporate Communications Department. In addition, the release date and time must be approved by Corporate Communications Department. This includes news releases generated by Pelatro as well as news releases generated by others that mention Pelatro. The Corporate Communications Department will be responsible for the transmission of all news releases. No other department or external agency is authorized to send a news release directly to a media.

F. Placing of advertisements

No Employee or agency will place a print, broadcast or web advertisement or sign an advertising contract (with the exception of employment ads, which must be coordinated through human resources) without the approval of the Corporate Communications Department. All advertisements, including those for trade, business or consumer publications, sponsorships and trade shows, must be approved by the Corporate/Marketing Communications Department prior to publishing.

G. Handling information requests

Information requests can be received by phone, email, fax, letter or even during casual conversation at trade shows and other events. Regardless of the method of inquiry, information requests should be handled as follows:

Trade media queries

Trade media inquiries should be directed to the Marketing Communications Department or to the Corporate Communications Department. Trade media inquiries for previously undisclosed material information and/ or information which is not readily available from divisions or local offices should be directed to the Marketing Communications Department.

Business/ Financial media queries

Business/ financial media inquiries should be directed to the Corporate Communications Department.

Local media queries of any other nature

Local media inquiries of any other nature should be directed to the Corporate Communications Department. Some business units may have created programs for other Pelatro offices to encourage relationship building with local media to enhance local sales and recruitment efforts, as well as to establish a positive local company image. Inquiries about these local programs should be directed to the Primary Spokesperson at Pelatro. In addition, the Primary Spokesperson may designate spokespersons to discuss local issues with members of the media.

General information requests

General public information requests should be directed to the Corporate Communications Department.

When in doubt, forward inquiries to the Corporate Communications Department.

H. Speeches and Presentations

Representatives of Pelatro regularly make speeches or participate in conferences. Such appearances must be approved by the appropriate business heads in the case of marketing-related presentations, or by the Marketing Communications Department for presentations that involve Pelatro overall, its strategies or its financial performance. In general, presentations should include only information covering the Employee's areas of responsibility and generally known and public information about Pelatro. Under no circumstances should speakers disclose material non-public information in the presentation or in any subsequent question and answer or other breakout meeting.

I. World Wide Web

1. The only authorized Pelatro World Wide Web (WWW) presence is www.pelatro.com. This medium's global reach and instantaneous nature present some unique challenges related to legality, security and content. Therefore, centralized content control is required for all visual and written information contained on the site. Standards for the Pelatro web presence are created and managed by the Corporate Communications Department.

2. No Employee, agency or other party is to place information of any kind regarding Pelatro, its products, operations or plans on any portion of the WWW.
3. Individual Employees are prohibited from using, or approving the use of, the Pelatro logo, copyrighted material or proprietary material of Pelatro, Inc. on the WWW without approval from the Corporate Communications Department.
4. All requests to register domain names on behalf of Pelatro anywhere in the world must be coordinated through the Corporate Communications Department. This is necessary to ensure consistency, protection of our trademark, and functionality of our web presence.
5. Use of the logo on a third-party Web site requires prior consent of the Corporate/ Marketing Communications Department. If used as a hyperlink, the logo should point to the Pelatro home page at www.Pelatro.com.

J. Internet Discussion Threads/ Chat Rooms

1. Pelatro will not comment on or reply to rumours, statements or questions posted on Internet discussion groups.
2. Employees are not authorized to speak on behalf of Pelatro, or to disclose any news about Pelatro, on Internet discussion groups.

Annexure 1: Contact details

Primary spokespersons;

Position	Name	Email
President & Co-Founder	Subash Menon	subash.menon@pelatro.com
Chief Executive Officer	Sudeesh Yezhuvath	sudeesh.yezhuvath@pelatro.com

IV. Pelatro Customer Interaction Code of Conduct

1. Introduction

The customer interaction code of conduct helps ensure compliance with legal requirements and our standards of business conduct. All Employees (this includes trainees and consultants representing Pelatro at customer sites and meetings) are expected to read and understand this customer interaction code of conduct and ethics, uphold these standards in day-to-day activities, comply with all applicable policies and procedures and ensure that they understand and adhere to these standards while at customer sites and/or during customer meetings.

We are committed to continuously review and update our policies and procedures. Therefore this customer interaction code of conduct is subject to modification at the discretion of Pelatro

- Access control system: In case the customer sites are equipped with access control system, Use the access control cards to enter and exit at the premises or any other location as mentioned by

customer. The access control cards should be carried whenever entering or exiting from a customer site.

- **Email accounts:** In case the customer has provided an Email account for official use. This must not be used to distribute or store, defamatory, fraudulent, harassing or obscene messages and files, or otherwise engage in any illegal or wrongful conduct. This includes use on insulting, sexist, racist, obscene or suggestive electronic mail.
- **Legal Adherence Clause:** You may not violate any local, state, national or international law or regulation.
- **Non-Harassment Clause:** You may not harass or threaten any customers of Pelatro
- **Non-Vulgarity Clause:** You may not use any sexually explicit, harmful, threatening, abusive, defamatory, obscene, hateful, religious, sexually oriented or ethnically offensive language. You may not attempt to communicate these by way acronyms, abbreviations or suggestions while at the customer site or during your interaction with the customers.
- **Non-Impersonation Clause:** You may not impersonate any customer of Pelatro, past or present.
- **Anti-Piracy Clause:** You may not arrange for the exchange or transfer of any pirated or illegal software while at the customer site.
- **Orderly Conduct Clause:** You will follow the instructions of authorized personnel or designated person while at customer site.
- **Tolerance Clause:** You may not organize nor be a member of any associations or groups that are based on, or supports any racist, sexist, anti- religious, anti-ethnic, anti-gay, or other hate-mongering philosophy.
- **Internet:** You may not upload or transmit on the network of the customer any content without prior written permission from the customers.
- **Anti-Hacking Clause:** You may not attempt to interfere with, hack into, or decode any transmissions to or from the servers running at the customer site
- **Use of customer premises:** A written permission should be obtained from the customer on the timelines of activities, which will be carried out at the customer site. In case of use of facilities and premises after office hours or weekends/holidays, prior approval should be obtained in writing
- **Access to Restricted Areas:** Employees working at client site are requested to confine themselves to areas allotted by the customer to carry out their official activity. Entry into any unauthorized/restricted area should be done only with the prior approval of the customers.
- **Changes in system:** Any change to be made in the system of the customers need to have prior approval from customers.

- Access to customer systems and network: Employees should have prior written permission from the customer to access any systems or network at their site either from the premises directly or remotely from any other locations.
- Security Policy: Employees at customer site should strictly follow the security policy laid down by our customers while carrying out the activities at the clients place.
- Infrastructure: Employees can use the internet, phone; fax etc provided and approved by the customer only for the job, activities or tasks related to the customer. Any use of this infrastructure for other purpose than that it was indented to, should have a prior written approval from the customer. If an emergency situation demands usage of such infrastructure for any purpose other than the specified, the same needs to be communicated immediately to the customer in writing with the reasons.
- Drug and Alcohol Abuse: To meet our responsibilities to customers, Pelatro must maintain healthy and productive work environment. Misuse of controlled substances and/or selling manufacturing, distributing, possessing, using or being under the influence of illegal drugs and alcohol on the job is absolutely prohibited
- Dress Code and other personal standards: Each Employee is a representative of the company in the eyes of the public, we must report to work properly groomed and wearing appropriate clothing. Employees are expected to dress neatly and in a manner consistent with the nature of work performed
- Payments or Gifts: Under no circumstances may Employees accept any offer, payment, promise to pay, authorization to pay any money, gift, or anything of value from customers directly or indirectly, to influence any decision, any act or failure to act, any commitment of fraud, or opportunity for the commission of any fraud. Inexpensive gifts, infrequent business meals, celebratory events and entertainment, provided that they are not excessive or create an appearance of impropriety, do not violate this policy. Before accepting anything of value from a customer, please contact the human resource department
- Handling the confidential information of Customers: All confidential information pertaining to the customer known to Employees working at site should not be disclosed to a third party without a prior written approval of the customer.

2. Disciplinary Action:

The matters covered in this section are of the utmost importance to Pelatro and are essential to the company's ability to conduct its business in accordance with its stated values. We expect all Employees to adhere to these rules in carrying out their duties for the company.

The company will take appropriate action against any Employee whose actions are found to violate these policies or any other policies of the company. Disciplinary actions may include immediate termination or business relationship at the company's sole discretion. Where the company has suffered a loss, it may be forced to take appropriate action for the damage caused. Where laws have been violated, the company will cooperate fully with the appropriate authorities.

V. Data protection policy

Contents

1. Scope
2. Policy statement
3. Related policies
4. Access control policy
5. Acceptable use policy

1. Scope

The scope of this policy is to establish guidelines for achieving appropriate protection of Employee's personal information from unauthorized access, use, disclosure, disruption, modification or destruction. The policy aims to formulate guidelines for the collection, storage, transmission, use and deletion of any personal information obtained from Employees in electronic and hard copy media by Pelatro.

This policy applies to all Employees and vendors or contractors working on behalf of Pelatro, in addition to applicable laws. The senior management of Pelatro reserves the right to modify this policy at its discretion.

Securing the information requires the participation of and support from all Employees with access to Pelatro's network and information. It is the responsibility of every user to help ensure that all information and data are kept confidential, secure and only accessible to those individuals that have a need to know such information.

2. Policy Statement

Pelatro records, stores and uses Employee's personal information, including sharing some of that required information with third parties, in order to operate its business and meet its obligations as an employer. As is the case with all sensitive, valuable business data, Pelatro will exercise reasonable care in protecting Employee's personal information from unauthorized access, use, modification and disclosure both internally and externally.

A key principle of this policy is that only authorized users may have access to Employee's personal information and those authorized users must adhere to the general requirements of the Access Control Policy and Acceptable Use Policy. This policy specifically prohibits any unauthorized or unlawful disclosure of Employee's personal information and is designed to ensure, to the extent practicable, the confidentiality of Employee's personal information. However, certain Employee's personal information will be provided when either required by law or when requested by third parties for verification purposes. Furthermore, any violations of this policy will result in disciplinary action in addition to legal sanctions. Nothing in this policy prevents an employee from disclosing his/her own personal information or engaging in any other conduct that is protected by law.

3. Related Policies and Documents

- a. Access Control Policy
- b. Acceptable Use Policy

A. Access Control Policy

The scope of this security policy includes all Pelatro networks and/or equipment that are owned or operated by Pelatro whether the information is on electronic media, printed as hardcopy, or transmitted over public/private networks. Pelatro shall ensure that our data collection supports reasonable business requirements, and does not use Employee's personal information for purposes that are incompatible with its business requirements.

Access to Employee's personal information Systems must be managed according to this policy.

Access Control

Access controls are technical mechanisms that restrict Employee's personal information access to authorized users. Such measures shall be implemented to ensure that security objectives are in compliance with all applicable laws and Pelatro's policies.

This policy applies to all Pelatro users who have access to, support, administer, manage, or maintain Pelatro network systems. All internal servers at Pelatro is managed by Systems Administration department.

Policy Statement

Pelatro's networks are essential to its success. Therefore, access to all network will be granted in a controlled manner driven by business requirements subject to the approval of the concerned System administration department with the approval of System Administration Head. Employees will be explicitly granted access to information or systems. There is no implicit right of access.

The process to manage access to information includes:

- Proper documentation, management and responsibilities of all users;
- Development and implementation of access control mechanisms, both technical and non-technical, to protect unauthorized access to applications and systems;
- Proper monitoring of access and use of applications and systems; and,
- Proper controls for authorized remote access to information.

Controls are developed, implemented, monitored and maintained by Pelatro to create user accountability and to ensure confidentiality, availability and integrity of Pelatro network and systems.

Access control measures adopted by Pelatro include secure and accountable means of authorization and authentication.

- Authorization is the process of determining whether or not an identified individual has been granted rights to Employee's personal information and determine what type of access is allowed, e.g read only, create, delete, and/or modify.
- Authentication is the process of confirming that a known individual is correctly associated with a given electronic credential, for example, by use of passwords to confirm correct association with a user or account name.

Access control typically consists of but are not limited to

- Login accounts set directly on Pelatro application and systems to be accessed or

- Use of a “Net ID” which is associated with an authentication mechanism,
- incorporated in the application and systems.

Pelatro provides all Employees with reasonable access to their own personal information and the ability to review and correct it, as applicable. It is the concerned Employee’s responsibility to ensure that all of his or her personal information is accurate, complete and current at all times. It is also the responsibility of the concerned Employee not to share his passwords to individual accounts with other individuals. Further all Employees are urged to change the passwords if they suspect any leakage of the same.

Third Party Access to Employee’s personal information

Pelatro does not transfer or provide access to Employee’s personal information to third parties. Sharing of personal information will occur only if it is required for business requirements, those third parties agree to give the data the equivalent level of protection that Pelatro provides, or another suitable level of protection as determined by Pelatro and only with the consent of the concerned Employee. Third parties that store, transmit or process Employee’s personal information must sign all required documents for this purpose.

Monitoring Access to Employee’s personal information

When users access Employee’s personal information Systems, access logs may record their actions. System administration team is responsible for reviewing access logs related to Employee’s personal information.

Acceptable Use Agreement

All users who have been given access to Employee personal information and must read and acknowledge the Acceptable Use Policy prior to being granted access to Pelatro networks.

Background Checks

Pelatro reserves the right to conduct background checks before providing access to any user. Background checks may include criminal checks and verification of employment records.

User Role Changes

When authorized users change roles within the company, their access will be immediately changed to reflect the new job responsibilities; new access must be added and old access that is no longer required must be removed.

User Responsibility

When access is granted, users are responsible for all system activity under their unique account. Users have the responsibility to protect their account by creating and maintaining passwords compliant with this policy in addition, users are responsible for maintaining the confidentiality of their unique ID and password by not sharing it with any other party.

Anti-Virus

Pelatro networks and servers are configured with updated anti-virus software. User must never attempt to disable anti-virus software.

Review of Access Privileges

Pelatro periodically re-evaluates the access granted to ascertain that the access is still commensurate with the user's job responsibilities.

User IDs found to be invalid must be disabled. Non-employee User IDs and access privileges, including vendor and business partner IDs, must be re-evaluated every six months. User IDs found to be invalid must be disabled and investigated immediately.

Terminated Employees and Contractors

User IDs of terminated or resigned users must be disabled from all information systems immediately upon notification from Human Resources and/or the responsible business unit or department. Every week, Human Resources must send a summary email notification of all new departures to all relevant system administration teams.

B. Acceptable Use Policy

Pelatro adheres to these minimum requirements described in this policy when storing and disposing of Employee's personal information. These are not exhaustive measures and Pelatro reserves the right to modify these measures in its endeavor to provide adequate security all proprietary information.

Use of personal information

Pelatro will use personal information provided by Employee's solely for conducting its business and in accordance with all applicable laws. Pelatro will provide the concerned Employee the required access to his/her personal information to modify or update the same. In no event other Employees or third parties are permitted to access or modify the personal information of fellow Employees.

Physical Security of Hard Copy Employee's personal information

Hard copy Employee's personal information must be secured in locked containers such as file cabinets whenever not in use. Keys must be available only to authorized users and must not be shared with anybody.

Taking back- up of personal information

Copies of Employee's personal information must be backed up to tape or other removable storage media for disaster recovery purposes. Back-up media containing Employee's personal information must be stored in a locked Pelatro or other Pelatro-authorized location only accessible by authorized users. Unauthorized persons are not permitted to modify or to take back up of any personal information belonging to others.

Disposal

When Employee's personal information is no longer required by the business and is not subject to any data retention policy, law or regulation, it must be disposed using a paper shredder, incinerator, or pulping. Alternately, a contracted service provider that applies one of these methods may be approved by the applicable authorized department head.

When electronic Employee's personal information is no longer required by the business and is not subject to any data retention policy, law or regulation, it must be irretrievably deleted from systems, databases, e-mail servers, PC hard drives and other storage devices. When the electronic media itself requires disposal, it must be degaussed, shred or incinerated.

Non disclosure obligations

All Employees are contractually bound not to disclose any personal information of others and any confidential information in their possession. This continues to apply even after their employment relationship has been terminated.

VI. Protection of Assets Policy

Contents

1. Introduction
2. E-Mail policy
3. Password protection policy
4. Anti Virus Process
5. Anti Virus Policy
6. Server security policy
7. VPN security policy
8. Wireless LAN Policy
9. Dial-In Access Policy
10. Extranet Policy
11. Internet Usage Policy

Introduction

These are the assets, which need to be protected, if not the proper functionality of the business processes can get affected;

Application servers, database servers, Intranet Services, Extranet Services , CVS Servers, Ftp servers, Pas Server, Back up Servers, business plans, projects in development, Mail Server etc.

1. E-Mail Policy

Purpose

To prevent tarnishing the public image of Pelatro when email goes out from Pelatro as the general public will tend to view that message as an official policy statement from Pelatro.

1.2 Scope

This policy covers appropriate use of any email sent from a Pelatro email address and applies to all Employees, vendors, and agents operating on behalf of Pelatro

1.3 Policy

1.3.1 Prohibited Use

The Pelatro email system shall not to be used for the creation or distribution of any disruptive or offensive messages, including offensive comments about race, gender, hair color, disabilities, age, sexual orientation, pornography, religious beliefs and practice, political beliefs, or national origin. Employees who receive any emails with this content from any Pelatro employee should report the matter to their supervisor immediately. Incoming/Outgoing mail size is limited to 10MB.

1.3.2 Personal Use

Using a reasonable amount of Pelatro resources for personal emails is acceptable, but non-work related email shall be saved in a separate folder from work related email. Sending chain letters or joke emails from Pelatro email account is prohibited. Virus or other malware warnings and mass mailings from Pelatro shall be approved by the concerned Manager before sending. These restrictions also apply to the forwarding of mail received by an Employee.

1.3.3 Monitoring

Pelatro may monitor messages stored, sent or received on the company's email system without prior notice.

2. Password Protection Policy

2.1 Overview

Passwords are an important aspect of computer security. They are the front line of protection for user accounts. A poorly chosen password may result in the compromise of security of entire corporate network. As such, all Employees (including contractors with access to Pelatro's systems) are responsible for taking the appropriate steps, as outlined below, to select and secure their passwords.

2.2 Purpose

The purpose of this policy is to establish a standard for creation of strong passwords, the protection of those passwords, and the frequency of change.

2.3 Scope

The scope of this policy includes all personnel who have or are responsible for an account (or any form of access that supports or requires a password) on any system that resides at any Pelatro facility, has access to Pelatro network, or stores any non-public Pelatro information.

2.4 General

All system-level passwords (e.g., root, enable, NT admin, application administration accounts, etc.) must be changed on at least a quarterly basis.

All production system-level passwords must be part of the System Admin administered global password management database.

All user-level passwords (e.g., email, web, desktop computer, etc.) must be changed at least every six months. The recommended change interval is every four months.

User accounts that have system-level privileges granted through group memberships or programs such as "pseudo" must have a unique password from all other accounts held by that user.

Passwords must not be inserted into email messages or other forms of electronic communication. All user- level and system-level passwords must conform to the guidelines described below.

2.5 Guidelines

A. General Password Construction Guidelines

Passwords are used for various purposes at Pelatro. Some of the more common uses include: user level accounts, Intranet accounts, Extranet Account, VPN Account, email accounts, screen saver protection, voicemail password, and local router logins. Passwords should contain both upper and lower case characters (e.g., a-z, A-Z) Have digits and punctuation characters as well as letters e.g., 0-9, !@#%&*()_+|~- =\`{}[]: ";'<>?,./)

Are at least eight alphanumeric characters long? Is not a word in any language, slang, dialect, jargon, etc? Are not based on personal information, names of family, etc. Passwords should never be written down or stored on-line. Try to create passwords that can be easily remembered. One way to do this is create a password based on a song title, affirmation, or other phrase. For example, the phrase might be:

"This May Be One Way to Remember" and the password could be: "TmB1w2R!" or "Tmb1W>r~" or some other variation.

Note: Do not use either of these examples as passwords!

B. Password Protection Standards
Do not use the same password for Pelatro accounts as for other non-Pelatro access (e.g., personal ISP account, option trading, benefits, etc.). Where possible, don't use the same password for various Pelatro access needs. For example, select one password for the Infrastructure systems and a separate password for IT systems.

Also, select a separate password to be used for an NT account and a UNIX account.

Do not share Pelatro passwords with anyone, including administrative assistants or secretaries. All passwords are to be treated as sensitive, Confidential Pelatro information.

Do not use the "Remember Password" feature of applications (e.g., Eudora, Outlook, Netscape Messenger, and Evolution).

Again, do not write passwords down and store them anywhere in your office. Do not store passwords in a file on ANY computer system (including Palm Pilots or similar devices) without encryption.

Change passwords at least once every six months (except system-level passwords which must be changed quarterly). The recommended change interval is every four months. If an account or password is suspected to have been compromised, report the incident to Sysadmin and change all passwords.

C. Use of Passwords for Remote Access Users

Access to the Pelatro Networks via remote access is to be controlled using either a one-time password authentication

3. Anti-Virus Process

Recommended processes to prevent virus problems:

- As per corporate security standards, update the software and patches regularly in a timely manner provided by system admin.
- NEVER open any files or macros attached to an email from an unknown, suspicious or untrustworthy source. Delete these attachments immediately, then "double delete" them by emptying your Trash.
- Delete spam, chain, and other junk email without forwarding, the same.
- Never download files from unknown or suspicious sources.
- Avoid direct disk sharing with read/write access unless there is absolutely a business requirement to do so.
- Always scan a CD or thumb drive or any such medium from an unknown source for viruses before using it.
- If there is a virus attack on the system, run the anti-virus utility to ensure a clean machine. When the anti-virus scan is running, do not run any applications that could transfer a virus, e.g., email or file sharing.
- New viruses are discovered almost every day. Periodically check the intranet for the patches and Recommended Processes for updates.

4. Anti-Virus Policy

4.1 Purpose

All computers connected to Pelatro network needs to have antivirus installed on the systems.

4.2 Scope

This policy applies to all Pelatro computers that are PC-based or utilize PC-file directory sharing. This includes desktop computers, laptop computers, file/ftp/proxy servers, and any PC based equipment such as Access control, Voice Billing, EPABX traffic generators.

4.3 Policy

All computers must have anti-virus software installed and scheduled to scan the complete system at regular intervals. In addition, the anti-virus software and the virus pattern files must be kept up to date. Virus- infected computers will be removed from the network until they are verified as virus-free. System Admin Manager / System Admin department are responsible for creating procedures that ensure anti-virus software is run at regular intervals, and computers are verified as virus-free. Any activities with the intention to create and/or distribute malicious programs into Pelatro's networks (e.g., viruses, worms, Trojan horses, e- mail bombs, etc.) are prohibited. Refer to Pelatro's Guide lines to anti virus process to help prevent virus problems.

Noted exceptions: Machines with operating systems other than those based on Microsoft products are exempted.

5. Server Security Policy

5.1 Purpose

The purpose of this policy is to establish standards for the base configuration of internal server that is owned and/or operated by Pelatro. Effective implementation of this policy will minimize unauthorized access to Pelatro proprietary information and technology.

5.2 Scope

This policy applies to following servers like Source Code Server, HR server, Finance Server, Mailing System, File Servers, Intranet, Extranet, FTP server.

5.3 Policy

5.3.1 Ownership and Responsibilities

All internal servers deployed at Pelatro is owned by an Systems Admin Dept that is responsible for system administration. Approved server configuration guides must be established and maintained by the Systems Admin Manager, based on business needs and approved by System Admin HOD. Systems Admin Dept should monitor configuration compliance and implement an exception policy tailored to their environment. Systems Admin Dept must establish a process for changing the configuration guides, which includes review and approval by System Admin HOD.

- Servers must be registered within the Hard Ware Register. At a minimum, the following information is required to positively identify the point of contact:
- Server contact(s) and location, and a backup contact
- Hardware and Operating System/Version
- Main functions and applications, if applicable
- Information in the Hard Ware Register must be kept up-to-date.
- Configuration changes for production servers must follow the appropriate change management procedures.

5.3.2 General Configuration Guidelines

- Operating System configuration should be in accordance with approved System Admin HOD.
- Services and applications that will not be used must be disabled where not required.
- Access to services should be logged and/or protected through access-control methods such as TCP Wrappers, if possible.
- The most recent security patches must be installed on the system as soon as practical, the only exception being when immediate application would interfere with business requirements.
- Always use standard security principles of least required access to perform a function.
- Do not use root when a non-privileged account will do.
- If a methodology for secure channel connection is available (i.e., technically feasible), privileged access must be performed over secure channels, (e.g., encrypted network connections using SSH or IPSec).
- Servers should be physically located in an access-controlled environment.

5.3.3 Monitoring

- All security-related events on critical or sensitive systems must be logged and audit trails saved as follows:
 - All security related logs will be kept online for a minimum of 1 week.
 - Daily incremental tape backups will be retained for at least 1 Week.
 - Weekly full tape backups of logs will be retained for at least 1 month.
 - Monthly full backups will be retained for a minimum of 2 Months.
- Security-related events will be reported to Systems Admin Manager, who will review logs and report incidents to IT management. Corrective measures will be prescribed as needed. Security-related events include,
 - Port-scan attacks
 - Evidence of unauthorized access to privileged accounts
 - Anomalous occurrences that are not related to specific applications on the host.

5.3.4 Compliance

- Audits will be performed on a quarterly basis by authorized person within Pelatro.
- Audits will be managed by the System Admin HOD, in accordance with the company policy. Systems Admin Manager will filter findings not related to a specific operational group and then present the findings to the Systems Admin Dept for remediation or justification.
- Every effort will be made to prevent audits from causing operational failures or disruptions.

6. Virtual Private Network (VPN) Policy

6.1 Purpose

The purpose of this policy is to provide guidelines for Remote Access IPSec, PPTP or L2TP Virtual Private Network (VPN) connections to Pelatro network.

6.2 Scope

This policy applies to all Employees, contractors, consultants, temporaries, and other workers including all personnel affiliated with third parties utilizing VPNs to access Pelatro network. This policy applies to implementations of VPN that are directed through an IPSec Concentrator.

6.3 Policy

Approved Pelatro Employees and authorized third parties (customers, vendors, etc.) may utilize the benefits of VPNs, which are a Pelatro managed service.

Additionally,

1. It is the responsibility of Employees with VPN privileges to ensure that unauthorized users are not allowed access to Pelatro internal networks.
2. VPN use is to be controlled using either a one-time password authentication such as a public/private key system with a strong passphrase.
3. When actively connected to the corporate network, VPNs will force all traffic to and from the PC over the VPN tunnel: all other traffic will be dropped.
4. Dual (split) tunneling is NOT permitted; only one network connection is allowed.
5. VPN users will be automatically disconnected from Pelatro network after thirty minutes of inactivity. The user must then logon again to reconnect to the network. Pings or other artificial network processes are not to be used to keep the connection open and the same will be allowed.
5. The VPN connection is limited to an absolute connection time of 24 hours.
6. Users of computers that are not Pelatro owned equipment must configure the equipment to comply with Pelatro VPN and Network policies.
7. Only VPN clients approved by Pelatro may be used.
8. By using VPN technology with personal equipment, users must understand that their machines are a de facto extension of Pelatro network, and as such are subject to the same rules and regulations that apply to Pelatro owned equipment, i.e., their machines must be configured to comply with Pelatro.
9. Security Policies.

7. Wireless Communication Policy

7.1 Purpose

This policy prohibits access to Pelatro networks via unsecured wireless communication mechanisms. Only wireless systems that meet the criteria of this policy or have been granted an exclusive waiver by Sys Admin Dept are approved for connectivity to Pelatro networks.

7.2 Scope

This policy covers all wireless data communication devices (e.g., personal computers, cellular phones, PDAs, etc.) connected to any of Pelatro internal networks. This includes any form of wireless communication device capable of transmitting packet data. Wireless devices and/or networks without any connectivity to Pelatro networks do not fall under the purview of this policy.

7.3 Policy

7.3.1 Register Access Points and Cards

All wireless Access Points / Base Stations connected to the network is registered and approved by Sys Admin Dept. These Access Points / Base Stations are subject to periodic penetration tests and audits. All wireless Network Interface Cards (i.e., PC cards) used in laptop or desktop computers must be registered with Sys Admin Dept

7.3.1.1 Approved Technology

All wireless LAN access must use corporate-approved vendor products and security configurations.

7.3.1.2 Encryption and Authentication

All computers with wireless LAN devices must utilize a corporate-approved encryption configured to drop all unauthenticated and unencrypted traffic. To comply with this policy, wireless implementations must maintain point to point hardware encryption of at least 128 bits. All implementations must support a hardware address that can be registered and tracked, i.e., a MAC address.

7.3.1.3 Setting the SSID

The SSID shall be configured so that it does not contain any identifying information about the organization, such as the company name, division title, employee name, or product identifier.

8. Dial-In Access Policy

8.1 Purpose

The purpose of this policy is to protect Pelatro electronic information from being inadvertently compromised by authorized personnel using a dial-in connection.

8.2 Scope

The scope of this policy is to define appropriate dial-in access and its use by authorized personnel.

8.3 Policy

Employees and authorized third parties (customers, etc.) can use dial-in connections to gain access to the corporate network. Dial-in access should be strictly controlled, using one-time password authentication.

It is the responsibility of Employees with dial-in access privileges to ensure a dial-in connection to Pelatro is not used by non-employees to gain access to company information system resources. An employee who is granted dial-in access privileges must remain constantly aware that dial-in connections between their location and Pelatro are literal extensions of Pelatro network, and that they provide a potential path to the company's most sensitive information. The employee and/or authorized third party individual must take every reasonable measure to protect Pelatro assets.

8.4 Enforcement

Any employee found to have violated this policy may be subject to disciplinary action.

9. Extranet Policy

9.1 Purpose

This document describes the policy under which third party organizations connect to Pelatro networks for the purpose of transacting business related to Pelatro.

9.2 Scope

Connections between third parties that require access to non-public Pelatro resources fall under this policy, regardless of whether a telco circuit (such as frame relay or ISDN) or VPN technology is used for the connection.

9.3 Policy

9.3.1 Pre-Requisites

9.3.2 Security Review

All new requests for extranet connectivity will go through a security review with approvals from senior Employees.

9.3.3 Third Party Connection Agreement

Approval from Management is required, can be in electronic format.

9.4 Establishing Connectivity

Department within Pelatro that wish to establish connectivity to a third party are to file a new site request with the proper extranet group. The extranet group will engage Systems Admin Ltd to address security issues inherent in the project. If the proposed connection is to terminate within a particular location at Pelatro network, the Department must engage the [name of team responsible for security]. The Department must provide full and complete information as to the nature of the proposed access to the extranet group and Sys Admin Dept, as requested.

All connectivity established must be based on the least-access principle, in accordance with the approved business requirements and the security review. In no case will Pelatro rely upon the third party to protect Pelatro network or resources.

9.5 Modifying or Changing Connectivity and Access

All changes in access must be accompanied by a valid business justification, and are subject to security review. Changes are to be implemented via corporate change management process. The Sponsoring Organization is responsible for notifying the extranet management group and/or Sys Admin Dept when there is a material change in their originally provided information so that security and connectivity evolve accordingly.

9.6 Terminating Access

When access is no longer required, the sponsoring organization within Pelatro must notify the extranet team responsible for that connectivity, which will then terminate the access. This may mean a modification of existing permissions up to terminating the circuit, as appropriate. The

extranet and Pelatro security teams must conduct an audit of their respective connections on an annual basis to ensure that all existing connections are still needed, and that the access provided meets the needs of the connection. Connections that are found to be depreciated, and/or are no longer being used to conduct Pelatro business, will be terminated immediately. Should a security incident or a finding that a circuit has been depreciated and is no longer being used to conduct Pelatro business necessitate a modification of existing permissions, or termination of connectivity, Sys Admin Dept and/or the extranet team will notify the POC or the Sponsoring Organization of the change prior to taking any action.

10. Internet Usage Policy

10.1 Purpose

Ensure that Employees don't abuse Internet usage at the workplace.

10.2 Scope

The scope of this policy is to define appropriate use of internet

10.3 Usage Policy

As part of this organization's commitment to the utilization of new technologies, many/all of our Employees have access to the Internet. In order protect us from being victimized by the threat of viruses or hacking into our server, the following is effective with immediate effect

1. It is (Organization's) policy to limit Internet access to official business. Employees are authorized to access the Internet for personal business after- office hours, in strict compliance with the other terms of this policy. The introduction of viruses, or malicious tampering with any computer system, is prohibited.
2. Employees using (Organization's) internet are acting as representatives of Pelatro. Employees should act accordingly to avoid damaging the reputation of the organization (When we access the internet our ip would be known to the outer world).
3. Files that are downloaded from the Internet must be scanned with virus detection software before installing or execution. All appropriate precautions should be taken to detect for a virus and, if necessary, to prevent its spread.
4. Employees shall not place company material (copyrighted software, internal correspondence, etc.) on any publicly accessible Internet computer without proper permission.
5. The Internet does not guarantee the privacy and confidentiality of information. Sensitive material transferred over the Internet may be at risk of detection by a third party. Employees must exercise caution and care when transferring such material in any form.
6. Unless otherwise noted, all software on the Internet should be considered copyrighted work. Therefore, Employees are prohibited from downloading software and/or modifying any such files without permission from the copyright holder.
7. Any infringing activity by an employee may be the responsibility of the organization (For example using P2P software like Kazza, Gautella, edonkey for sharing data). Therefore, Pelatro may choose to hold the employee liable for the employee's actions.
8. Pelatro Ltd reserves the right to inspect an employee's computer system for violations of this policy.
9. Any Employee working on a clients system may not access the internet or intranet unless required for the delivery of agreed services.

VII. Pelatro Electronic Mail Policy

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 - 3.10 Email which addresses a group email ID
4. Changes to this policy

This policy applies to all Employees, consultants and others, who utilize Pelatro's computer systems and other information resources and assets. It recognizes that all users have a responsibility towards the integrity and confidentiality of information, through their respective conditions of employment and conditions of engagement and defines more specifically, accountabilities, responsibilities and guidelines for ensuring all information resources and assets are adequately protected.

1. Introduction

This Electronic Mail Policy and the supporting Standards and Guidelines reflect the operating philosophy of Pelatro.

Its underlying objectives are:

- To promote awareness and to highlight to all users the importance of maintaining good electronic mail practices.
- To prevent the misuse of Pelatro's electronic mail infrastructure.
- This policy defines accountabilities, responsibilities and guidelines for ensuring the most efficient use of Pelatro's electronic mail infrastructure.

2. Scope

This policy complements the Protection of Assets Policy which lists email policies relating to prohibited use, personal use and monitoring. All areas of the Protection of Assets Policy apply to this email policy as well. Electronic mail (email) is an important part of Pelatro's corporate culture and has a significant impact on the organization in terms of the security of its information resources and its overall efficiency. There is also an increasing reliance on email infrastructure to support routine corporate communications and business operations. Information stored in these systems is growing in quantity and becoming an increasingly important and valuable asset. The integrity, confidentiality and availability of this information are essential for Pelatro to remain a leading provider of telecom software products. Confidentiality assures that the email information is protected from abuse and unauthorized access. Availability assures that the email infrastructure is on-line and accessible by authorized staff as required. Integrity safeguards the accuracy and completeness of information. This policy attempts to cover all possible aspects of email usage. If however a particular issue has

not been addressed within the policy it does not imply that it is condoned by the organization. In these cases users must always use their judgment in determining whether a particular activity is likely to breach the policy and is therefore contrary to the best interests of Pelatro's business.

3. Electronic Mail Policy

3.1 Asset and Disclosure

Email information resources held by Pelatro are considered to be assets of the company and all email users are responsible and accountable for their proper use and for their protection from unauthorized use or disclosure. Email users must not disclose Pelatro information to external parties without proper authorization.

3.2 Illegal Use

Email users must not use Pelatro's email systems to infringe copyrights or other intellectual property rights of third parties, to distribute or store, defamatory, fraudulent, harassing or obscene messages and files, or otherwise to engage in any illegal or wrongful conduct. This includes the use of insulting, sexist, racist, obscene or suggestive electronic mail.

3.3 Privacy

Email users can have a general expectation of a reasonable degree of privacy; however, they should be aware that email is not guaranteed to be private. In some instances Pelatro may access or disclose the electronic messages or files of a user. This will only be undertaken by the responsible System Administrator or delegate. This access will be undertaken to:

- Protect system security
- Investigate any potentially illegal, unlawful or improper conduct.
- Investigate serious misconduct involving the harassment of staff or other individuals
- Comply with legal process
- Protect the rights or property of Pelatro
- Provide access for a colleague to access information stored in an email account if the user is absent, unavailable, or on leave and it is necessary to view email or other files.
- Conduct regular audits on email usage and content to ensure compliance with the Electronic Mail Policy. No unauthorized Pelatro email user or any other individual has permission to view any email that is not intended for them or to open any file for which the author has not granted them access.

3.4 Mass distribution of email/ unsolicited mass email/ Broadcast rights

Employees who wish to send a mass, unsolicited email that is not intended as part of their work or is deemed unofficial given their scope of work (including personal wishes for an occasion), to all others or to one of the email distribution lists, need prior approval to do so, since it uses valuable bandwidth resources and infringes on the privacy and work time of other Employees. Specifically, someone who wishes to send an email to all Employees in a particular geographical location or all locations should make a request to the Human Resources Department (info@pelatro.com), if such a mail is perceived to be outside their scope of work.

3.5 Exceptions to unsolicited mass distribution of email

- A personal wish to a known set of Employees (known peers/ seniors/ others) is allowed. In essence, do not use one of the mailing groups (for instance, Pelatro – Bangalore) to convey your wishes. Instead, send it to a set of people you are familiar with.
- Members of Pelatro Culture Club are permitted to use email distribution lists to broadcast announcements.
- All unsolicited mails pertaining to medical emergencies (blood donation, organ donation etc.) of known people (relatives, friends etc.) are exempt and may be sent directly by the Employee to a chosen mailing list/ group. If the medical emergency pertains to a person not known to the Employee (typically, forwarded mails from outsiders), the mail should be forwarded to the Human Resources Department info@pelatro.com) with a request to broadcast the message across the organization. Human Resources will have the sole discretion to accept or dismiss such requests.
- Mails about invitation to personal occasions such as wedding, parties etc. are allowed as long as it is sent to the appropriate mailing list (For instance, a UK focused wedding invite should be sent only to Employees in UK, and not to all Employees across the world).

3.6 Security

- An appropriate level of security must be adopted by users when using Pelatro's email systems for transmission over Public Network Services (eg. the Internet, bulletin boards, blogs etc.) of (a) confidential documents or (b) sensitive material that may adversely impact Pelatro's business.
- Forging another's identity or attempting to conceal the origin of a message in any way is prohibited.
- Any suspected breach of security or email policy must be reported immediately to the relevant line Manager.

3.7 Personal Use

- Unauthorized use of Pelatro's email systems for commercial purposes or personal monetary gain is prohibited.
- Use of Pelatro's email systems for incidental personal purposes, though not encouraged, will be tolerated provided it is kept to a minimum and it does not adversely affect the performance of the email system.
- Personal mail is subject to the same conditions of privacy as work related mail.

3.8 Internet Email

Users must be aware that the correspondence and any discussions into which they enter when using Pelatro's email system and the Internet may be construed to be representative of Pelatro's position. This may have significant legal implications. Where the user does not have the authority or is not aware of Pelatro's position or where their personal view may vary from that of Pelatro's, they must clearly state that the opinion expressed, is that of the writer, and not necessarily that of Pelatro's. Where the user is representing the views of Pelatro (and is authorized to do so), then a notation must be appended to the communication identifying the individual and the position held within Pelatro. Special care must be taken when commercial or contractual matters, quotes or tenders are dealt with by email. There may be significant legal implications. Think twice before you email.

3.9 Consequences of Email Policy Violations

Any security exposures, misuse or non-compliance must be reported as soon as an occurrence is identified. Failure to comply with the Protection of Assets Policy/ Electronic Mail Policy may lead to disciplinary procedures.

Failure to comply with Policies may result in any or all of the following:

- Suspension and/or termination of access to Pelatro's systems
- Additional disciplinary action as determined by relevant Line Managers in line with existing policies.
- Referral to law enforcement authorities for criminal prosecution
- Other legal action, including action to recover civil damages and penalties

3.10 Email which addresses a group email id

- Any email which addresses a group email id should always use this group email id in the 'Bcc' field of the email so that any accidental "Reply All" will not result in unsolicited email to every member of the group.
- An email which necessitates a group reply (for ex: a discussion thread).
- If the email client has a problem with accepting just 'Bcc' addresses, the sender can just address the email to self with 'Bcc' to group.

4. Changes to this Policy

Pelatro reserves the right to amend this Policy from time to time, without notice. Users must ensure that they abide by the latest version of this Policy. Copies of this policy will be made available on Pelatro's internet (external) and intranet sites.

VIII. Software Compliance Policy

Pelatro licenses software from third parties for specific business purposes. As a licensee of third party software, Pelatro must comply with the requirements set forth in all third party software license agreements. Non-compliance with these agreements may result in significant legal liability, loss of reputation, and financial loss. Only fully licensed software that is approved by IT management may be used on Pelatro Applications and Systems.

Since compliance with policies is of vital importance to Pelatro's success, various teams are authorized to conduct assessments at their discretion with any scope they deem appropriate to measure Pelatro's compliance with software license agreements. All Pelatro users are responsible for their own compliance with software license requirements.

Software License Agreements

User Responsibilities

Users authorized to purchase software licenses on behalf of Pelatro must comply with third party licensing agreements. These licensing agreements often contain specific restrictions (e.g., number of

copies allowed to be installed, the number of computers the software can be installed on, or the number of concurrent users of the software allowed at any one time). Users must not install software in a manner inconsistent with the licensing agreement.

Contractors who install Pelatro licensed software on their non-Pelatro equipment are responsible for removing it at the end of the contract. If a contractor chooses to keep the software, he or she must purchase or license it. All software licenses must be reviewed and approved by Pelatro Legal in advance of being signed.

Shareware and Freeware

There are many freeware and shareware programs available on the Internet and other locations that perform a wide variety of tasks. Some of these programs are ineffective, inefficient, not secure, or actually include malicious code to harm a computer or network. Because of this, only shareware and freeware approved by the IT management may be installed on Pelatro Applications and Systems. In addition, open source licenses must be reviewed by Corporate Legal.

Software Copyrights

All users of licensed software or shareware must strictly abide by applicable copyright laws and restrictions.

Software License Compliance Monitoring

IT Management or concerned department heads must monitor software usage on workstations and servers and determine whether Pelatro is in compliance with its licensing agreements. IT Management and department heads may use automated or manual processes and may work with Procurement team to monitor software compliance. When software is in violation of a license agreement, it must be immediately removed or purchased in accordance with Pelatro purchasing procedures. Violations of software licenses may result in disciplinary action, up to and including termination.

IX. Pelatro provided Laptop / Desktop and Mobile Facility Usage

Employees using / carrying company provided laptop / desktop and mobile facilities should not be used for the following:

Storing, transmission, obtaining possession, demonstration, advertisement or requesting the transmission of objectionable / inappropriate material(s);

- Viewing, transmission or storage of pornographic material;
- Viewing, transmission or storage of material promoting or causing racial, sexual or disability discrimination;
- Viewing, transmission or storage of material promoting or causing disability discrimination;
- Viewing, transmission or storage of material promoting or causing violence;
- Viewing, transmission or storage of material associated with,
- promoting or causing criminal activity;

- Viewing, transmission or storage of material in connection with harassment or which can reasonably be expected will cause offence.

Storing, using, disseminating materials in violation of copyright laws including articles, music, videos, games, software, etc.

No Employee is to use a camera phone or camera in any area where customer work is being carried out without authorisation. Failure to comply with this request may result in disciplinary action