

Employee Code of Conduct Policy

Purpose

The Employee Code of Conduct outlines standards of personal and professional conduct that all employees must strive to uphold and behave in an ethical and professional manner at all times. The Code provides a basis for all employees to maintain a working environment that is productive, positive, enjoyable, safe and free from harassment and discrimination. It will also assist managers to induct employees into the Athena Cars and Tours Pvt Ltd and address any circumstances that may arise which conflict with the stated standards and Values.

Scope

The Employee Code of Conduct provides clear guidelines and standards for the appropriate behaviour expected of Athena Cars and Tours Pvt Ltd employees.

Process

This Code of Conduct provides a framework for appropriate behaviour for all Athena Cars and Tours Pvt Ltd employees where they can address ethical issues, which employees and management:

- conduct themselves towards other employees or colleagues, employees' representatives and their representatives, government authorities and clients;
- perform their duties and obligations
- fulfil the mission, goals and objectives of Athena Cars and Tours Pvt Ltd; and
- practice fairness and equity.

The Code of Conduct is established on the following organisational values: integrity, honesty, conscientiousness, compassion, courtesy, fairness, and respect. This relies on individuals being responsible for their own professional behaviour within the provisions of this code, Athena Cars and Tours Pvt Ltd policies, legislation and relevant industrial clauses that apply to individual contracts of employment.

Where there is doubt as to the application of the Code, or the appropriate course of action to be adopted, employees affected should discuss the matter with their manager.

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1. Managers/Supervisors responsibilities

Managers are responsible and accountable for:

- Undertaking their duties and behaving in a manner that is consistent with the provisions of the Employee Code of Conduct
- Informing employees in their teams about the Employee Code of Conduct, relevant policies, procedures and minutes
- Providing appropriate training and/or performance counselling to ensure the required standard is met.
- Reporting any departure from the Employee Code of Conduct by themselves or others
- Acting consistently and fairly in dealing with behaviour that breaches this code.

2. Employees responsibilities

All employees have a responsibility to:

- Be personally responsible and accountable for their own performance, behaviour and attendance in the workplace
- Undertake their duties and behave in a manner that is consistent with the provisions of the Employee Code of Conduct.
- Report any departure from the Employee Code of Conduct by themselves or others
- Comply with Shire policies and procedures
- Promote a positive, safe and healthy environment in the conduct of their work

3. Personal conduct

Attendance and punctuality:

1. Employees are expected to be punctual and regular in their attendance.
2. When an employee is unavoidably absent from work due to sickness or any other reason, the employee should telephone their manager (or appropriate delegate) promptly (preferably before their normal starting time) and indicate their likely return to work.

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3. Managers may exercise their responsibility to contact employees who have not contacted them directly within a reasonable timeframe to ascertain the reasons for that individual's absence.
4. Employees wishing to extend their leave must arrange this before commencing the leave. If the employee is on leave they must speak to their immediate manager at least 2 working days before their leave ends.

4. Dress and Appearance

Athena Cars and Tours Pvt Ltd is well-recognised and respected and projects a particular image to our clients. Employees must therefore ensure that their appearance is neat, clean and appropriate for their particular area of work. A high standard of personal hygiene is expected at all times.

Where a uniform is provided, it must be worn in accordance with the Athena Cars and Tours Pvt Ltd requirements. When wearing a uniform to and from work, employees are expected to conduct themselves in a responsible and professional manner. The manager is responsible for determining the dress code appropriate to the environment while the manager can make exceptions for medical purposes.

Casual business wear is defined as:

- trousers, pants, skirts
- modest shirts, blouses, jumpers, cardigans, non-sports jackets

Casual business wear does not include:

- denim jeans or leggings
- any form of sports shoes (including joggers or runners), thongs, slippers or dilapidated footwear
- athletic wear
- torn or ripped clothing (even if 'designer' tears)
- unsuitably revealing clothing (including backless tops or dresses, or garments that reveal the midriff)
- any clothing displaying offensive messages including racist or similar

5. Personal behaviour

Employees are required to undertake their duties in a professional, responsible, conscientious and ethical manner and to act in the best interests of the Athena Cars and Tours Pvt Ltd. They are expected to act honestly in all of their duties when dealing with clients, suppliers, contractors and fellow employees.

6. Natural justice, fairness and equity

If an employee is required to investigate complaints against other employees or issues affecting employees, they must act consistently, promptly, and fairly and in a timely manner. The principles of natural justice must be maintained in dealing with each investigation.

7. Use of facilities and equipment

Employees should take all possible care when using Athena Cars and Tours Pvt Ltd & its client's property, goods, intellectual property and services and ensure they are used efficiently, carefully and honestly.

Unless permission has been granted by the employees manager, Athena Cars and Tours Pvt Ltd resources are not to be used for private purposes.

8. Privacy and use of personal and official information

Employees have an obligation to ensure that professional information is secured against loss, misuse or unauthorised access, modification or disclosure.

Employees have a duty to maintain the confidentiality, integrity and security of official information for which they are responsible.

9. Records management

Employees need to be aware of their record keeping responsibilities and are reminded there is a legal requirement to adhere to proper records management practices and procedures.

All employees must therefore ensure that Athena Cars and Tours Pvt Ltd documents are not placed in unofficial or private filing systems but place such documents in official files.

Employees must not remove documents from official files. They are controlled records, and must be complete, up-to-date and capable of providing organisational accountability when officially scrutinised.

Employees must not damage, dispose of, or in any other manner, interfere with official documents or files. The destruction of records may only take place in accordance with a disposal and retention schedule, which has been approved by the Director.

10. Information technology

Employees must not access information which they are not authorised to access or use, and must not allow any other person access for any reason.

Employees must take all reasonable precautions, including password maintenance and file protection measures to prevent unauthorised access and have an obligation to maintain the security and confidentiality of the information systems over which they have responsibility or control and that are owned or used by agreement.

11. Conflict of interest

If an employee becomes aware of the potential for conflict of interest then they must notify their manager of the potential or actual conflict of interest. Athena Cars and Tours Pvt Ltd expects employees to:

- declare any likely conflict of interest to supervisors; and
- avoid any detrimental outcome as a result of a conflict of interest.

If a conflict of interest arises where a employees:

- engages or is likely to engage in activities or advances, or
- is likely to advance personal or other interests at the expense of Athena Cars and Tours Pvt Ltd interests or the interests of other employees, Athena Cars and Tours Pvt Ltd may then intervene.

Employees must ensure that there is no conflict or incompatibility between their personal interests, whether pecuniary (eg money) or non-pecuniary and the impartial fulfilment of their duties. It is not possible to define all potential areas of conflict of interest but a number of situations are referred to below.

- gifts and hospitality offered where there is an expectation of a return favour (which may or may not be to the detriment of the Athena Cars and Tours Pvt Ltd.
- additional employment that prevents or hinders the performance of a person in their role
- decisions regarding the employment or promotion of relatives or friends
- promotion of or soliciting for clients for own private business

If an employee is in doubt as to whether a conflict exists, they must contact their manager. Wherever possible employees should disqualify themselves from situations of conflict of interest.

Where an employee has an impartiality, financial or proximity interest in any matter regarding provisions outlined within this Code, or which might be perceived as being in conflict with the interest of another person who may be affected then the employee must immediately disclose this to the Director or at the meeting if prior disclosure is not possible.

12. Financial interests

Employees should avoid any financial involvement or undertaking that could directly or indirectly compromise or undermine the performance of their duties or the Athena Cars and Tours Pvt Ltd objectives or activities.

Financial conflict of interest may arise where an employee, who has a financial interest in a company or other business, is in a position to influence contracts or transactions between the Athena Cars and Tours Pvt Ltd and that business. This conflict may extend to any business undertaking in which employees and their immediate family or the employees is acting in direct competition with the Athena Cars and Tours Pvt Ltd activities or interests for personal gain.

13. Acceptance of commissions, gifts or benefits

Employees should not accept a gift, secret commission or a benefit from a person or organisation outside the Athena Cars and Tours Pvt Ltd if the intent of the gift or the benefit is to induce the employee to waive or reduce requirements or to extend a financial or other benefit to a person or organisation outside the Athena Cars and Tours Pvt Ltd to the detriment of the Athena Cars and Tours Pvt Ltd interests.

As a general rule, no employee should accept a gift or benefit if it could be seen as intended or likely to cause that person to:

- perform their job in a particular way, which the person would not normally do, or
- deviate from the proper or usual course of duty.

Employees may accept token gifts or benefits in circumstances approved by the Director or a nominee, provided that there is no possibility that the employee might be perceived to be, compromised in the process. Gifts of a nominal value generally used for promotional purposes by the donor, or moderate acts of hospitality may be accepted by employees.

The employee must advise their manager of any gifts and benefits they have received as soon as the gift or benefit is received and must not take advantage or seek to take advantage of their position to obtain a benefit, either for themselves or for someone else.

14. Influence to secure advantage

No employee shall elicit the improper influence or interest of any person to obtain promotion, transfer or other advantage.

15. Use of official information

While employees can contribute to public debate on social issues there are some circumstances in which public comment is inappropriate. Public comment by employees should not imply that the comment, although made in a private capacity,

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is in some way an official comment by Athena Cars and Tours Pvt Ltd. The employee may only disclose official information, with due regard to confidentiality, in order that it is in their official capacity and duties.

An employee can disclose confidential or restricted information or documents acquired in the course of their employment only when required to do so by law, in the course of their duty, when called to give evidence in court, or when proper authority has been given. Approval to release confidential information on employees should be sought from the Director or a nominee.

In circumstances where employees are requested to provide information, they should provide it in a timely and accurate manner and which complies with the principles of Freedom of Information, confidentiality, and the rights of the individual.

Employee's acting in honorary capacities may be asked by third parties to make comment on Athena Cars and Tours Pvt Ltd policy or procedure and in such cases, employees should confine comments to factual information. Where employees are privy to information of a restricted nature, which may compromise the position of the Athena Cars and Tours Pvt Ltd or infringe on the privacy of members of Athena Cars and Tours Pvt Ltd, the information should not be divulged.

16. Employee/client boundaries

The term 'employee/client boundaries' identifies the importance of the trust inherent in the relationship between employees and their clients however, breaching of employee/client boundaries is going outside the limits of the employee/client relationship.

Employees are expected to maintain proper boundaries with clients. Employees are expected to make themselves aware of any workplace and/or program-specific policies/guidelines in this area.

17. Relatives and close friends

A conflict of interest may arise where an employee makes or participates in decisions affecting another person with whom they have a personal relationship (such as a relative, spouse, close friend or personal associate).

In cases where a conflict may arise, employees must advise their manager. Wherever possible employees should disqualify themselves from dealing with those persons in such situations.

18. Personal and professional behaviour

Employees should perform the duties associated with their position to the best of their ability, diligently, impartially and conscientiously. In the performance of their duties, employees should:

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- comply with legislative and industrial obligations and administrative policies
- fulfil their Equal Employment Opportunity and Occupational Safety & Health obligations
- strive to keep up to date with advances and changes in the knowledge and the professional and ethical standards relevant to their areas and expertise
- maintain adequate documents to support decisions made
- treat all persons with courtesy and sensitivity to their rights and provide all necessary and appropriate assistance
- not take or seek to take improper advantage of any official information gained in the employment with Athena Cars and Tours Pvt Ltd
- not harass or discriminate against employees or in work practices on the grounds of sex, pregnancy, race (including colour, ethnic background or national identity), marital status, disability, sexual preference, political or religious belief, or age
- act responsibly when becoming aware of any unethical behaviour or wrong doing by any employee. Such information should be forwarded to the Director or a nominee
- continuously improve work performance. All employees should actively pursue quality improvements
- not make disparaging remarks about other employees

19. Alcohol and substance abuse or misuse

Employees must ensure that the safety and health of other employees, volunteers and clients are not endangered by any misuse. The Athena Cars and Tours Pvt Ltd expects employees to perform their jobs with skill, care and diligence. Employees should not perform any act or omission that is likely to have a detrimental effect on their work performance and that of other employees and clients. Accordingly, employees should not be under the influence of alcohol or other substances while they are at work or at work functions.

Possession, use or trafficking in illegal drugs on the premises is not permitted. The Athena Cars and Tours Pvt Ltd premises include but are not limited to all buildings, vehicles, car parks, meeting rooms, and open spaces. Any such activity will be immediately referred to the police and the Athena Cars and Tours Pvt Ltd may take disciplinary action, which may include termination of employment.

Employees must notify the manager if the taking of, or failure to take, prescribed medication is likely to affect their performance and/or affect the safety of any person at the workplace. This is to ensure workplace safety is not jeopardised and that any performance impact is properly managed. It is the responsibility of employees to follow the directions/precautions for any drugs prescribed by a health professional for

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individual use and/or commercially available preparations that may impact their capacity.

20. Smoking

Passive smoking can impact on other employees, the community and create a poor image of the Athena Cars and Tours Pvt Ltd, which does not promote or encourage smoking. Smoking is not permitted in Athena Cars and Tours Pvt Ltd owned or leased vehicles or buildings.

Employees may only smoke in their own time during authorised breaks as set out in the award, agreement or employment contract and/or as authorised individually by their manager.

21. Policies

Employees are responsible to carry out and comply with the Athena Cars and Tours Pvt Ltd policies and procedures and legislation. It is acknowledged that employee views, on particular matters, may differ from the Athena Cars and Tours Pvt Ltd, however such views must not either interfere with the performance of an employee's duty or prevent the employee from supporting the Athena Cars and Tours Pvt Ltd objectives.

22. Compliance with lawful instructions

Employees must comply with any lawful instruction given by any person having authority to make or give such an instruction.

23. Bullying

Bullying is unreasonable behaviour that is directed against an individual or group by another individual or group and is derived from the misuse of power over the target of the behaviour. This may include:

- verbal abuse, shouting
- excluding or isolating behaviour
- deliberately withholding information vital for effective work performance
- giving employees impossible assignments
- physical abuse

Bullying is unacceptable conduct within the Athena Cars and Tours Pvt Ltd and all reported incidents will be investigated.

Whilst it is the responsibility of all employees within the Athena Cars and Tours Pvt Ltd to ensure that premises and facilities are free from harassment, managers have a particular and clear responsibility to meet this requirement. Managers who become aware of serious breaches of policy must immediately notify their manager or the Director or a nominee.

24. Discrimination and Equal Employment Opportunity (EEO)

Anti-discrimination laws provide guidelines on respecting personal difference. Treating people differently on the basis of personal characteristics is unlawful. The following are examples of attributes: age, industrial activity, parental status, political belief, personal association, race, ethnic background, carer status, marital status, pregnancy/potential, lawful sexual activity, unrelated criminal record, impairment, religious belief/activity, physical features, gender identity, disability and sex.

Discrimination is unacceptable conduct within the Athena Cars and Tours Pvt Ltd and all reported incidents will be investigated.

25. Harassment

Harassment is any type of behaviour that:

- the other person does not want and does not return
- offends, embarrasses, or scares them, and may be either sexual or non sexual in nature
- targets them because of their race, sex, pregnancy, or other protected attribute under the law
- constitutes a form of bullying
- harassment does not have to be a series of incidents or an ongoing pattern of behaviour. Neither does harassment need to be intentional to attract disciplinary action. Harassment can occur in any work-related context including:
 - Social functions
 - Conferences
 - Office social gatherings
 - Business trips

Harassment and discrimination form part of a continuum of unacceptable behaviour that can include sexual assault, stalking and harassing phone calls, some of which are also against criminal law, which means the police may prosecute anyone who commits such acts.

Fair discipline, performance counselling or workplace control practices based only on performance issues do not, in themselves, constitute harassment.

26. Racial and religious vilification

Racial and religious vilification is conduct that incites hatred against, serious contempt for, or revulsion or severe ridicule against a person or group on the grounds of racial identification or religious belief or activity. Racial and religious vilification is a form of harassment and discrimination and is unacceptable conduct in the Athena Cars and Tours Pvt Ltd. All reported incidents will be investigated.

27. Occupational safety and health

The Athena Cars and Tours Pvt Ltd is committed to providing a safe and healthy workplace for all employees and visitors however, employees have a responsibility to make the workplace a safe and healthy place for all concerned, as far as is reasonably practical.

It is therefore important that employees are familiar with the standards or procedures in their particular area of work. If employees have not been advised of these standards or procedures during the induction process, they must as a matter of urgency ask their immediate manager to obtain the necessary information.

All employees are responsible for:

- knowing and complying with the OSH rules and guidelines
- working so as not to endanger themselves or any other person by any act or omission
- use and follow OSH instructions, training or other information
- report all incidents, accidents, injuries and hazards to management for action

28. Professional development

Employees must continually strive to improve their professional competence, maintain their knowledge and encourage the development of their skills and competence of associates.

29. External employment

Athena Cars and Tours Pvt Ltd will not restrain employees from working outside business hours provided that the employees do not undermine or compromise the Athena Cars and Tours Pvt Ltd. Employees should not engage in such employment, if that employment:

- places them in conflict with their official duties, or would lead to the perception that they have placed themselves in conflict with their duties;
- is likely to affect their efficiency in the performance of their duties; or

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- involves the use of Athena Cars and Tours Pvt Ltd resources for private purpose without authorisation or recompense.

Subject to current policies, employees may not accept outside payment for activities, which would be regarded as part of their normal work activities.

30. Ownership of products and copyright

All products, literary, dramatic, musical, cinematographic and artistic works, computer programs, material in written or other format, discoveries, inventions and improvements in relation to such matters, together with all copyright and intellectual property created, authored, discovered, developed or produced by the employee for the purpose of, or in the course of, the employee's employment will remain the property of the Athena Cars and Tours Pvt Ltd and will not be used by the employee other than for the purpose of Shire business.

Unless otherwise agreed, the Athena Cars and Tours Pvt Ltd retains the copyright of work produced by you during your employment with the Athena Cars and Tours Pvt Ltd.

Upon termination of employment the employee will return all correspondence, documents, data, information, equipment and things, including copies thereof, belonging to the employer that may be in the employee's possession, custody or control.

31. Public conduct and media contact

Employees making comments in a public forum on any matter relating to the Athena Cars and Tours Pvt Ltd must act in a way that is in keeping with the values and protects the reputation of the Athena Cars and Tours Pvt Ltd. Only authorised personnel may speak with the media on behalf of the Athena Cars and Tours Pvt Ltd. Employees are not permitted to speak with media representatives without first receiving clearance from the Director or a nominee.

32. Misuse

Employees must not deliberately misuse Shire equipment, assets, or the services of other Shire personnel. When using Shire equipment, employees are required to follow the instructions provided in order to avoid personal injury and/or maintenance and replacement costs. Examples of misuse include:

- copying computer software programs regardless of whether or not the programs are protected by copyright
- use of the Athena Cars and Tours Pvt Ltd letterhead paper or postage when corresponding on personal or other matters not directly related to the Athena Cars and Tours Pvt Ltd
- unauthorised use of the Athena Cars and Tours Pvt Ltd logos

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- falsifying, manipulating or destroying business records without specific authorisation
- using the Athena Cars and Tours Pvt Ltd equipment for personal commercial gain
- Employees provided with vehicles (private or commuter use) are expected to use them in accordance with the Athena Cars and Tours Pvt Ltd policy and guidelines.

33. Confidentiality

Employees may have access to personal or commercial information relating to individuals, the public, or the financial or other operations of the Athena Cars and Tours Pvt Ltd. This information is to be used for Shire purposes only and should remain secure and confidential. It is important that the community has confidence that information acquired by the Athena Cars and Tours Pvt Ltd is only used for the stated purposes for which it was collected.

Employees must not discuss or release to any unauthorised person and/or anyone outside of the Shire, any confidential or sensitive information relating to the Athena Cars and Tours Pvt Ltd and/or its operations.

34. Grievance handling

It is expected that as a first step, employees will attempt to resolve the issues between themselves. Where this is not appropriate or does not result in a satisfactory resolution a more formal procedure as outlined in the Grievance – Resolving Issues and Concerns Policy can be applied.

The dispute resolution process will operate within the following principles: Confidentiality, Impartiality, Promptness, Sensitivity, Courtesy and Respect.

Disputes may be resolved in a formal or informal manner. Where possible, as a first step and with the agreement of both parties, the dispute may be resolved informally. If the dispute is not resolved at the informal level then the formal process provides graduated steps for further discussion and resolution at high levels of authority. A formal resolution requires a thorough investigation to be undertaken, and the process documented.

Appropriate managers will investigate a complaint or allegation of behaviour that is contrary to these standards. Investigations will be carried out with sensitivity and fairness and maintain confidentiality.

35. Breaches of the Code

The Athena Cars and Tours Pvt Ltd is committed to the standards set out in the Employee Code of Conduct. Where a breach of the Code has been identified by the Athena Cars and Tours Pvt Ltd a response to the breach may result in:

- counselling
- disciplinary action

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- termination of employment
- suspension; or laying of criminal charges or civil action.

36. Terminology

- employees refer to general employee
- personal information means any information about an identified or identifiable individual that is not available in the public domain
- records management is the control and management of records to meet business, legal, fiscal and administrative requirements. It is a business imperative, a corporate responsibility and a critical function performed through the collective actions of individuals
- a record is recorded information in any form, including data in computer systems, created or received by any employees of the (insert name of organisation) in the course of his/her duties
- conflicts of interest are assessed in terms of the likelihood that employees possessing a particular interest could be influenced, or might appear to be influenced, in the performance of their duties
- public comment includes public speaking engagements, comments on radio and television; and expressing views in letters to the newspapers or in books, journals or notices, or where it might be expected that the publication or circulation of the comment will spread to the community at large; and
- senior Officer means the Executive Managers

37. Email

Staff may only use e-mail and web browsing for work related purposes and that all e-mail and web access logs will be monitored for compliance with the staff position. As the organisation has responsibility for its computer systems and networks, it has the right to make directions as to its use.

Informing people about the personal information that is collected, held and what is done with it is an important privacy principle.

FOR Athena Cars and Tours Pvt Ltd.,

Sreeharsha S D
Director

