

	CODE OF CONDUCT
Cooperation of MSPCAT	The company shall also not treat these activities as optional ones, but shall strive to incorporate them as integral part of its business plan. The company shall also encourage volunteering among its employees and help them to work in the community.
Public representation of the company	MSP CAT shall honour the information requirements of the public and its stakeholders. In all its public appearance with respect to disclosing company and business information to public constituencies such as the media, the financial community, employees and shareholders, MSP CAT shall be represented only by specifically authorized directors, executives and employees. It will be the sole responsibility of these authorized representatives to disclose information of the company or the group.
Ethical Conduct	Every employee of MSP CAT, including whole-time directors and the CEO, shall deal on behalf of the company with professionalism, honesty and integrity, as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be as such by third parties.
Regulatory Compliance	Every employee of MSP CAT shall, in his or her business conduct, comply with all applicable laws and regulations, both in letter and in spirit, in all the territories in which he or she operates. If the ethical and professional standards set out in the applicable laws and regulations are below that of the code, then the standards of the code shall prevail.
Equal-opportunities employer	MSP CAT shall provide equal opportunities to all its employees and all qualified applicants for employment, without regard to their race, caste, religion, color, ancestry, marital status, sex, sexual orientation, age, nationality and disability. Employees of MSP CAT shall be treated with dignity and in accordance with the MSP CAT policy of maintaining a work environment free of sexual harassment, whether physical, verbal or psychological. Employee policies and practices shall be administered in a manner that ensures that in all matters equal opportunity is provided to those eligible and that decisions are based on merit.
Child and Forced Labor	It is our policy to restrict employment to those lower than the local minimum employment age. Our policy also includes an explicit ban on the use of any forced labor or exploitative working conditions.
Anti-Bribery and Corruption	It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.
Gifts and donations	MSP CAT and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits which are intended to or perceived to obtain business or uncompetitive favours for the conduct of its business. However, MSP CAT and its employees may accept and offer nominal gifts, which are customarily given and are of a commemorative nature, for certain events.
Government agencies	MSP CAT and its employees shall not offer or give any company funds or property as donation to any government agencies or their representatives, directly or through intermediaries, in order to obtain any favourable performance of official duties.

Concurrent employment	An employee of MSP CAT shall not, without the prior approval of the CEO, accept employment or a position of responsibility (such as a consultant or a director) with any other company, nor provide “freelance” services to anyone. In the case of a whole-time director or the CEO, prior approval must be obtained for providing such services from the BOD of the company.
Conflict of interest	<p>An employee of MSP CAT shall not engage in any business, relationship or activity which might detrimentally conflict with the interest of his company or the Group. A conflict of interest, actual or potential, may arise where, directly or indirectly:</p> <ul style="list-style-type: none"> • an employee of MSP CAT engages in a business, relationship or activity with anyone who is party to a transaction with his or her company; • an employee is in a position to derive a personal benefit or a benefit to any of his or her relatives by making or influencing decisions relating to any transaction; • an independent judgement of the company's or Group's best interest cannot be exercised. <p>The main areas of such actual or potential conflicts of interest would include the following:</p> <ul style="list-style-type: none"> • Financial interest of an employee of MSP CAT or his relatives, including the holding of an investment in the subscribed share capital of any company or a share in any firm which is an actual or potential competitor, supplier, customer, distributor, joint venture or other alliance partner of the MSP CAT company. (The ownership of up to 1 per cent of the subscribed share capital of a publicly held company shall not ordinarily constitute a financial interest for this purpose.) • An employee of MSP CAT conducting business on behalf of his or her company, or being in a position to influence a decision with regard to his or her company's business with a supplier or customer of which his or her relative is a principal, officer or representative, resulting in a benefit to him/her relative. • Award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of a relative of an employee of MSP CAT, where such an individual is in a position to influence the decision with regard to such benefits. • Acceptance of gifts, donations, hospitality and/or entertainment beyond the customary level from existing or potential suppliers, customers or other third parties which have business dealings with the company. <p>Notwithstanding that such or other instances of conflict of interest exist due to any historical reasons, adequate and full disclosure by the interested employees should be made to the company's management. It is also incumbent upon every employee to make a full disclosure of any interest which the employee or the employee's immediate family, which would include parents, spouse and children, may have in a company or firm which is a supplier, customer, distributor of or has other business dealings with his or her company.</p> <p>Every employee who is required to make a disclosure as mentioned above shall do so, in writing, to his or her immediate superior, who shall forward the information along with comments to the person designated for this purpose by the CEO, who in turn will place it before the BOD, upon a decision being taken in the matter, the employee concerned will be required to take necessary action as advised to resolve/avoid the conflict.</p> <p>If an employee fails to make a disclosure as required herein, and the management of its own</p>

	accord becomes aware of an instance of conflict of interest that ought to have been disclosed by the employee, the management shall take a serious view of the matter and consider suitable disciplinary action against the employee.
Protecting company assets	The assets of MSP CAT shall not be misused but shall be employed for the purpose of conducting the business for which they are duly authorised. These include tangible assets such as equipment and machinery, systems, facilities, materials and resources as well as intangible assets such as proprietary information, relationships with customers and suppliers, etc.
Citizenship	An employee of MSP CAT shall in his or her private life be free to pursue an active role in civic or political affairs as long as it does not adversely affect the business or interests of the company.
Integrity of data furnished	Every employee of MSP CAT shall ensure, at all times, the integrity of data or information furnished by him or her to the company.
Reporting concerns	Every employee of MSP CAT shall promptly report to the CEO any actual or possible violation of this Code, or an event he or she becomes aware of that could affect the business or reputation of his/her or any other MSP company.
Competition	<p>MSP CAT shall fully strive for the establishment and support of a competitive, open market economy in the locations in which it operates, and shall cooperate in efforts to promote the progressive and judicious liberalisation of trade and investment by a country. Specifically, MSP CAT shall not engage in activities that generate or support the formation of monopolies, dominant market positions, cartels and similar unfair trade practices.</p> <p>MSP CAT shall market its products and services on its own merits and shall not make unfair misleading statements about competitors' products and services. Any collection of competitive information shall be made only in the normal course of business and shall be obtained only through legally permitted sources and means.</p>
Safety, Health, and Environment	MSP CAT shall strive to provide a safe and healthy working environment and comply, in the conduct of its business affairs, with all regulations regarding the preservation of the environment of the territory it operates in. MSP CAT shall be committed to prevent the wasteful use of natural resources and minimise any hazardous impact of the development, production, use and disposal of any of its products and services on the ecological environment.
Quality of products and services	MSP CAT shall be committed to supplying goods and services of the highest quality standards, backed by efficient after-sales service consistent with the requirements of the customers to ensure their total satisfaction. The quality standards of the company's goods and services should meet the required national standards, and the company shall endeavour to achieve international standards.
Corporate citizenship	MSP CAT shall be committed to be a good corporate citizen, not only in compliance with all relevant laws and regulations, but also by actively assisting in the improvement of the quality of life of the people in the communities in which it operates, with the objective of making them self-reliant. Such social responsibility would comprise: Initiating and supporting initiatives in the field of community health and family welfare, vocational training, education and literacy, and encouraging the application of modern scientific and managerial techniques and expertise.

Approved by : Chief Executive Officer

