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# CAYO HOLDINGS (PVT) LIMITED

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COMPANY POLICY & PROCEDURES



JANUARY 1, 2021

# Code of Business Conduct and Ethics

In performing their job duties, Cayo Holdings Private Limited employees should always act lawfully, ethically, and in the best interests of Cayo Holdings Private Limited. This Code of Business Conduct and Ethics (the "Code of Conduct") sets out basic guiding principles. Employees who are unsure whether their conduct or the conduct of their coworkers complies with the Code of Conduct should contact their manager or the Legal Department. Employees may also report any suspected noncompliance as provided in the Legal Department's reporting guidelines.

Our **Employee Code of Conduct company policy** outlines our expectations regarding employees' behavior towards their colleagues, supervisors and overall organization. We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

## Scope

This policy applies to all our employees regardless of employment agreement or rank.

## Policy Elements

Company employees are bound by their contract to follow our Employee Code of Conduct while performing their duties. We outline the components of our Code of Conduct below:

### Compliance with law

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

### Respect in the workplace

All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization. Employees should conform to our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

### Protection of Company Property

All employees should treat our company's property, whether material or intangible, with respect and care.

Employees:

Shouldn't misuse **company equipment** or use it frivolously.

Should respect all kinds of **incorporeal property**. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.

Employees should protect company facilities and other material property from damage and vandalism, whenever possible.

### **Professionalism**

All employees must show integrity and professionalism in the workplace:

### **Personal appearance**

All employees must follow our dress code and personal appearance guidelines.

### **Corruption**

We discourage employees from accepting gifts from clients or partners. We prohibit bribes for the benefit of any external or internal party.

### **Job duties and authority**

All employees should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner. We encourage mentoring throughout our company.

### **Absenteeism and tardiness**

Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. But, generally, we expect employees to be punctual when coming to and leaving from work.

### **Conflict of interest**

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

### **Collaboration**

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

### **Communication**

All employees must be open for communication with their colleagues, supervisors or team members.

### **Benefits**

We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.

### **Policies**

All employees should read and follow our company policies. If they have any questions, they should ask their managers or Human Resources (HR) department.

## Disciplinary actions

Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include: Demotion, Reprimand. Suspension or termination for more serious offenses or Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behavior.

# Employment Basics

## Employment contract types

Full-time employees work at least *40 hours* per week or *160 hours* per month on average.

Part-time employees are those who work fewer than *40 hours* per week.

Full-time and part-time employees can have either temporary or indefinite duration contracts. Full-time employees under an indefinite duration contract are entitled to our company's full benefits package.

## Equal opportunity employment

Cayo Holdings Private Limited is an equal opportunity employer. We don't tolerate discrimination against protected characteristics (gender, age, sexual orientation, race, nationality, ethnicity, religion, disability, veteran status.) We want all employees (including executives and HR) to treat others with respect and professionalism. In practice, this means that we:

- *Hire and promote people based on skills, experience or potential and try to reduce bias in every process (e.g. through structured interviews.)*
- *Make accommodations to help people with disabilities move about safely on our premises and use our products, services and equipment.*
- *Use inclusive, diversity-sensitive language in all official documents, signs and job ads.*
- *Conduct diversity and communication training.*

Apart from those actions, we commit to penalizing every discriminatory, offensive or inappropriate behavior. To do this properly, we ask you to report any discriminatory action against yourself or your colleagues to HR. Our company will not retaliate against you if you file a complaint or discrimination lawsuit. Any employee who retaliates or discriminates will face disciplinary action.

# Recruitment and selection process

Our hiring steps might vary across roles, but we always aim for a recruitment and selection process that is fair and effective in hiring great people. If you are hiring for an open role, you will likely go through these steps:

1. Identify the need for a new job opening.
2. Decide whether to hire externally or internally.
3. Review job descriptions and write a job ad.
4. Get approval for your job ad.
5. Select appropriate sources (external or internal) to post your job opening.
6. Decide on hiring stages and possible timeframes.
7. Review resumes in our company database/ATS.
8. Source passive candidates.
9. Shortlist applicants.
10. Screen and interview candidates.
11. Run background checks and check references.
12. Select the most suitable candidate.
13. Make an official offer.

Steps may overlap, so skip steps when appropriate. Each member of a hiring team might have different responsibilities (e.g. recruiter's source and hiring manager's interview candidates.)

Throughout this process, we aim to keep candidates informed, communicate well with each other and give everyone an equal opportunity to work with us. Ask our recruiters for help whenever you need to enhance candidate experience or write an inclusive job description.

## Background checks

If you want to run background checks on candidates, ask HR for guidance. This process is sensitive and we must always abide by laws and ensure candidates understand our intentions. As a general rule, commission a background check for finalists only. Use our contracted provider and ensure you have your candidates' permission.

## Referrals

If you know someone who you think would be a good fit for a position at our company, feel free to refer them. If we end up hiring your referred candidate, you are eligible for a referral bonus. Our employee referral rewards may be higher if we hire your referred candidate in a hard-to-fill role.

Additional rules for rewards:

- We guarantee that rewards will be paid out within *a month* of the date we hired a candidate.
- There is no cap on the number of referrals an employee can make. All rewards will be paid accordingly.
- If two or more employees refer the same candidate, only the first referrer will receive the referral incentives.
- Referrers are still eligible for rewards even if a candidate is hired at a later time or gets hired for another position.

## Who can be referred?

We have two conditions for candidates who can qualify you for our rewards. They should:

- Have not applied to our company for at least a year.
- Be hired as permanent full- or part-time employees (not as temporary employees or contractors.)

Our company may use an online form or a platform where employees may refer candidates. You can also reach out directly to our *HR/recruiters/Talent Acquisition Manager* with referrals.

Generally, we encourage you to check our open positions and consider your social networks and external networks as potential resources for referred candidates.

Keep in mind that rewards may be subject to taxation. Please contact HR or our referral program manager for more information.

## Attendance

We expect you to be present during your scheduled working hours. If you face an emergency that prevents you from coming to work one day, contact your manager as soon as possible. We will excuse unreported absences in cases of *serious accidents, acute medical emergencies*. But, whenever possible, we should know when you won't be coming in.

# **Employee Benefits and Perks**

## **Employee health**

Employee health is important to us. We don't discriminate against people with disabilities or health conditions, but we want to do everything possible to help employees stay healthy. At a minimum, we provide health insurance to all eligible employees. For more information about our insurance package, contact HR.

We have also established non-smoking and substance abuse policies to protect employee health. We will create a workplace with minimal noise and good lighting and offer [free healthy snacks, wellness programs.]

## **Workers' compensation**

We strive to keep our workplace safe, but accidents may happen occasionally. Employees who are injured at work (by accident or disease) can receive wage replacement, medical care and rehabilitation benefits according to workers' compensation laws, when appropriate. Please inform us of your injury as soon as possible. Ask HR for forms that you need to file a claim or contact your state agency for workers' compensation.

## **Work from home**

If your job doesn't require you to be present at our premises, you can occasionally work from home (WFH). Please inform your manager that you want to work from home at least two days in advance. If there's a rare emergency, you may work from home without having received prior approval, but call or email your manager as soon as possible. If they are in a different time-zone, contact HR instead.

When you are working from home, please use an internet connection and devices that are fast and secure. Choose a place without loud noises or distractions. And, check in with your team frequently to make collaboration easier.

If there is inclement weather (e.g. a blizzard) please check your designated email to see if the office is officially closed. If you judge that your commute during inclement weather is dangerous, let us know. We will not force you to come to work if your safety is at stake or if there is an official travel warning.

## **Remote working**

Remote working refers to working from a non-office location on a temporary or permanent basis. If you're an office-based employee, you may work remotely for a maximum of two consecutive weeks per year. You may arrange this if you are a new parent or suffer from a short-term disability. If you have another



reason, talk to your manager. Submit your remote working requests *through our HR* at least *one week* in advance.

If you work remotely permanently, we ask that you adhere to our security, confidentiality and equal opportunity policies just like your office-based colleagues.

## Employee expenses

There are some expenses that we will pay directly on your behalf (e.g. hotel rooms for work-related travel.) But, we ask you to keep track and report on those reimbursable expenses that you pay yourself. We reimburse employee expenses that are related to:

- Business travel
- Relocation
- Education and training

Not all travel expenses are reimbursable. For example, we will pay for your transportation to an airport for work-related travel, but not to a museum for a personal visit. Before traveling for business, contact HR to clarify which expenses are reimbursable within your particular trip.

Please keep receipts for all reimbursable expenses. You can submit them to your within three months after the date of each expense. If your manager approves your expenses, you will receive your reimbursement within two pay periods by check.

## Company Vehicle

You may drive a company vehicle if you:

- Need it as an indispensable part of your job
- Receive it as a benefit attached to your job.

Either way, your vehicle belongs to our company. You may use your company vehicle for personal reasons as our company vehicle policy permits. You will get reimbursed only for approved, business-related expenses.

To get a company vehicle, you should have a valid driver's license and a clean driving record for at least two years. Drive safe and sober and respect traffic laws and fellow motorists. You should also check your vehicle regularly to ensure gas, tire pressure and all vehicle fluids are at appropriate levels.

We expect you to avoid:

- Smoking in a company vehicle.
- Leasing, selling or lending a company vehicle.
- Using a company vehicle to teach someone how to drive.

- Leaving your company vehicle unlocked, unattended or parked in dangerous areas.
- Allowing unauthorized people to drive a company vehicle, unless an emergency mandates it.

On our part, we will ensure that our vehicles are safe and in good condition, as well as appropriately insured.

## **Accidents**

If you are involved in an accident with a company car, contact our HR department immediately, so we can get in touch with our insurance provider. You shouldn't accept responsibility or guarantee payment to another person without authorization.

Follow this policy's guidelines to avoid disciplinary action. For minor offenses, like allowing unauthorized people to drive a company car, we will reprimand you or reclaim your car. But for more serious offenses, like causing an accident while intoxicated, we may terminate you.

## **Parking**

We will prioritize parking space assignments for employees with disabilities, executives and employees who drive company vehicles. We will then allocate our remaining parking spaces on a first-come, first-served basis. Interns and trainees may also receive parking spaces. If you want to receive a parking spot, file your request with our HR department/ facilities manager.

We expect you to keep our parking lot clean and use only your assigned space. Please behave responsibly to avoid causing damage, injury or loss of property.

We will not assume any liability for theft, vandalism, fire or damage regarding an employee's vehicle in our parking lot.

## **Company-issued equipment**

As an employee, you may receive company cell phone, laptop or other device, furniture. Unless otherwise mentioned in your contract, any equipment we offer belongs to our company and you may not sell it or give it away. You are also responsible for keeping our equipment safe and in as good condition as possible. If your equipment breaks or malfunctions, let us know so we can arrange to get it repaired.

If you are part of our corporate cell phone plan, please use your phone within our plan's restraints. You may have to pay any extra charges yourself.

## **Theft and damage of company equipment**

Our equipment may or may not be insured for theft and damage. We ask you to inform us within *24 hours* if your equipment is stolen or damaged. We might be able to trace stolen laptops and cell phones. Please also file a theft statement affidavit with the police and submit a copy to us.

## **Security of company issued devices**

We advise you to keep your company-issued computer, tablet and cell phone secure. You can do this if you:

- Keep all devices password-protected.
- Ensure you do not leave your devices unattended.
- Install security updates for browsers and other systems as soon as updates are available.
- Log into company accounts and systems through secure and private networks only.
- Follow all instructions for disk encryption, anti-malware protection and password management that you received along with your equipment.

# Working Hours, PTO and Vacation

## Working hours

Our company operates between *8.30 a.m. to 11.30 p.m. on all days*. You may come to work at any time depending on your team's needs.

Some departments may work after hours, too. If you work in these departments, you will follow a shift schedule as needed.

## Paid time off (PTO)

Employees receive 20 days of Paid Time off (PTO) per year. Your PTO accrual begins the day you join our company and you receive *1.7 days per month*. You can take your PTO at any time after your first *week* with us and you *can* use time off you haven't accrued yet. You will earn one additional day per year after your *first year* with our company, with a cap at *21 days overall*.

If you want to use PTO, send a request *through our manager*. If your manager or HR approves, you are permitted to take your leave. You do not have to specify a reason for requesting PTO.

You *cannot* transfer any remaining PTO to the next year. However, you will be able to encash your remaining PTOs at the end of the calendar year.

If you leave our company, we may compensate accrued PTO with your final paycheck according to local law. When the law doesn't have provisions, we will compensate accrued leave to employees who were not terminated for cause.

## Holidays

Our company observes all the mercantile holidays declared by the government of Sri Lanka.

### Holiday pay

Exempt employees are entitled to their normal compensation without any deductions.

Permanent non-exempt employees receive holiday pay as a benefit after they have worked with us for more than *three months*.

### Working on a holiday

These holidays are considered "off-days" for most employees. If you need a team member to work on a holiday, inform them at least *three days* in advance.

If you are a non-exempt employee, you will receive your regular hourly rate with a premium for working on a holiday. If you are an exempt employee, we will grant you an additional day of PTO that you must take within *12 months* after that holiday.

We *won't* count hours you worked on a holiday to decide whether you are entitled to overtime pay.

## Sick leave

We offer one week of paid sick leave. In situations where employees are entitled to a greater number of sick leave days by law, we will follow that law. You can take sick leave to recover from short-term illness, injuries, mental issues and other indisposition. If you have the flu or other contagious disease, please use your sick days.

If you become sick, inform your manager and send a sick leave request. You may take a partial day off or work from home, but we advise you to rest and recuperate for a day before returning to work.

Use your PTO or arrange for a flexible work schedule if you want to attend routine health care.

Occasionally, we may ask you to submit a physician's note or other medical certification and/or complete a sick leave form. We will do this for insurance purposes if you are absent for more than three days of sick leave.

## Long-term illness

You are eligible for this type of leave if you have worked for us for more than 24 months and you have worked at least 1,250 hours within 12 months before your leave begins. Contact HR for more information when needed.

## Bereavement leave

Losing a loved one is traumatizing. If this happens to you while you work with us, we want to support you and give you time to cope and mourn.

For this reason, we offer *three days* of paid bereavement leave. You may take your bereavement leave on *consecutive* days to:

- Arrange a funeral or memorial service.
- Attend a funeral or memorial service.
- Resolve matters of inheritance.
- Fulfill other family obligations.
- Mourn.

If you have to travel long-distance for a funeral or service, you can take *two* additional unpaid days off. If you require more time, please use your PTO.

## **Jury duty and voting**

If you are called for jury duty and you are an exempt employee, you can take one day off without deduction from your salary. If local or national law stipulates more days of paid jury duty leave, we will follow the law. On Election Day, you can take off as per the governing regulations to vote.

Hourly employees may take one unpaid day off for jury duty and voting. If local or national law obliges us to provide hourly employees with paid jury duty leave, we will follow the law.

To keep good records, we ask you to bring us a copy of your summons for jury duty and a document that proves you served.

## **Parental leave**

Caring for a newborn is an exciting time for parents. We want to support new mothers and fathers in their first months of parenthood with paternity and maternity leave. Afterwards, we will continue to support parents with flexible work options and child care.

### **Paternity and maternity leave**

Our company offers three months of paid maternity and three days of paternity leave. If local or national law stipulates longer leave, we will follow the law.

If you are about to be a new mother or father either through childbirth or adoption, talk to HR to arrange your leave. Please give us at least three months' notice before your leave begins.

Depending on local or national law, pregnant women can take part of their leave before labor. If you suffer complications during childbirth or have other issues, you can ask for an unpaid leave extension of up to two months. Contact HR as soon as possible to arrange this.

### **Returning to work after parental leave**

We are committed to helping new parents transition back to work after their leave ends. We offer:

- Remote working/ Flexible hours.
- Onsite/ External paid day care.
- Lactation rooms.

# **Employee Compensation and Development**

## **Compensation status**

### **Overtime**

Occasionally, we may need you to work more than your regular working hours. We will pay for overtime work according to local and national laws.

## **Payroll**

We pay your salary or wage at the end of month by checks/ bank transfers/ cash. If you are an hourly employee, you should be diligent in clocking in and out/using our timesheet software so we can accurately calculate your pay.

## **Performance management**

We have built our performance management practices to:

- Ensure you understand your job responsibilities and have specific goals to meet.
- Provide you with actionable and timely feedback on your work.
- Invest in development opportunities that help you grow professionally.
- Recognize and reward your work in financial or non-financial ways (e.g. employee awards.)

To meet these objectives, we have:

Established quarterly performance reviews. During these reviews, your manager will fill out your performance evaluation report and arrange a meeting with you to discuss it. Through these discussions, managers aim to recognize employees who are good at their jobs, identify areas of improvement and talk about career moves. Pay increases or bonuses are not guaranteed. But, we encourage managers to recommend rewards for their team members when they deserve them. There won't be any forced ranking or other comparison between employees, as our goal is to help all employees improve and develop their careers.

Instructed all managers to meet with their team members once per week to provide feedback and talk about their work and motivations. This way, you can receive feedback in a timely manner and avoid surprises during your quarterly performance review.

## **How we expect managers to lead employees**

If you manage a team, you are responsible for your team members' performance. To conduct effective regular meetings and performance evaluations, we expect you to:

- **Set clear objectives.** Your team members should know what you expect of them. When you first hire someone to your team, ensure they understand their job duties. Set specific goals for each team member and team-wide if applicable. Revisit those goals quarterly performance reviews.
- **Provide useful feedback.** During scheduled meetings with your team members, give them both guidance and praise, as appropriate. Be fair and specific to help them understand and implement your feedback.
- **Keep your team members involved.** There should be two-way communication between you and your team. Make your expectations clear, but always take your team members' motivations and aspirations into account. Discuss training and development opportunities that may interest your team members.
- **Keep logs with important incidents about each one of your team members.** These logs help you evaluate your team, but may also prove useful when rewarding, promoting or terminating your team members.

## Employee training and development

We owe our success to our employees. To show our gratitude, we will invest in our employee's professional development. We want employees to feel confident about improving their efficiency and productivity. We also want to help our employees achieve personal growth and success.

Each employee has Rs. 10,000.00 annually to spend on educational activities or material. Subscriptions and books are included in this budget, unless they are necessary for you to complete your everyday duties. Send your expenses to HR by email.

Apart from online courses, we offer these training opportunities:

- Formal training sessions (individual or corporate.)
- Employee coaching and mentoring.
- Seats at industry conferences.
- On-the-job training.
- Job shadowing.
- Job rotation.

Development is a collective process. Team members and managers should regularly discuss learning needs and opportunities. And it's HR's responsibility to facilitate any development activities and processes.



# Employee Resignation and Termination

## Progressive discipline

Here we outline steps we will take to address employee misconduct. We want to give employees a chance to correct their behavior when possible and assist them in doing so. We also want to ensure that we thoroughly investigate and handle serious offenses.

Our progressive discipline process has six steps of increasing severity. These steps are:

1. Verbal warning
2. Informal meeting with supervisor
3. Formal reprimand
4. Formal disciplinary meeting
5. Penalties
6. Termination

Different offenses correspond to different steps in our disciplinary process. For example, minor, one-time offenses (e.g. breach of our dress code policy) will trigger Step 1. More severe violations (e.g. sexual harassment) will trigger step 5.

If you manage employees, inform them when you launch a progressive discipline process. Pointing out a performance issue is not necessarily a verbal warning and may be part of your regular feedback. If you judge that progressive discipline is appropriate, let your team member know and ask HR to help you explain our full procedure.

Managers may skip or repeat steps at their discretion. Our company may treat circumstances differently from that described in this policy. But, we are always obliged to act fairly and lawfully and document every stage of our progressive discipline process.

Keep in mind that our company isn't obliged to follow the steps of our progressive discipline process. As you are employed "at-will" in the Sri Lanka, we may terminate you directly without launching a progressive discipline process. For serious offenses (e.g. sexual harassment), we may terminate you without warning.

## Resignation

You resign when you voluntarily inform HR or your manager that you will stop working for our company. We also consider you resigned if you don't come to work for three consecutive days without notice.

You are not obliged to give us advance notice before resigning. But, for efficiency's sake, and to make sure our workplace runs smoothly, unless otherwise mentioned in your employment agreement we ask that you give at least two weeks' notice, if possible. If you hold a highly specialized or executive position, we ask that you give us at least a month's notice, when possible.

We do not accept verbal resignations, we prefer that you submit a written and signed notice of resignation for our HR records. We will reply with an acceptance of resignation letter within two days. HR will inform your manager that you are resigning if you haven't already done so. Whether you want to announce your resignation to your team is up to you, but we encourage you to be open.

#### Tuition or relocation reimbursement

If you have relocated or studied at our company's expense, you are bound by your contract to remain with us for at least two years. If you resign before that period, you may have to reimburse us for part or all of these expenses.

#### Forced resignation

You can resign anytime at your own free will and nobody should force you into resignation. Forcing someone into resigning (directly or indirectly) is constructive dismissal and we won't tolerate it. Specifically, we prohibit employees from:

- Creating a hostile or unpleasant environment.
- Demanding or coaxing an employee to resign.
- Victimizing, harassing or retaliating against an employee.
- Forcing an employee to resign by taking unofficial adverse actions (e.g. demotions, increased workload).

## Termination

Terminating an employee is always unpleasant but sometimes necessary. If that happens, we want to ensure we act lawfully and respectfully.

We may terminate an employee either for cause or without cause.

- For cause termination is justified when an employee breaches their contract, engages in illegal activities (e.g. embezzlement), disrupts our workplace (e.g. harasses colleagues), performs below acceptable standards or causes damage or financial loss to our company.
- Without cause termination refers to redundancies or layoffs that may be necessary if we cease some of our operations or re-assign job duties within teams. We will follow applicable laws regarding notice and payouts.

We will offer severance pay to eligible employees. We may also help employees who were terminated without cause to find work elsewhere, if possible.

We may also compensate accrued vacation and sick leave upon termination, depending on local law. Whenever local law doesn't have relevant stipulations, we will pay accrued leave only to those who weren't terminated for cause. We will also take into account union agreements and abide by agreed terms.

If you manage team members, avoid wrongful dismissal. When you terminate an employee for cause, we expect you to be certain you made the right choice and keep accurate performance and/or disciplinary records to support your decision.

## References

When we terminate employees, we may provide references for those who leave in good standing. This means that employees shouldn't have been terminated for cause. If you are laid off, you may receive references. Please ask your manager.

If you resign, you may ask for references and your manager has a right to oblige or refuse.

# Workplace Policies

## Confidentiality and data protection

We want to ensure that private information about clients, employees, partners and our company is well-protected. Examples of confidential information are:

- Employee records
- Unpublished financial information
- Data of customers/partners/vendors
- Customer lists (existing and prospective)
- Unpublished goals, forecasts and initiatives marked as confidential

As part of our hiring process, we may ask you to sign non-compete and non-disclosure agreements (NDAs.) We are also committed to:

- Restrict and monitor access to sensitive data.
- Develop transparent data collection procedures.
- Train employees in online privacy and security measures.
- Build secure networks to protect online data from cyber-attacks.
- Establish data protection practices (e.g. secure locks, data encryption, frequent backups, and access authorization.)

We also expect you to act responsibly when handling confidential information.

### You must:

- Lock or secure confidential information at all times.
- Shred confidential documents when they're no longer needed.
- Make sure you view confidential information on secure devices only.
- Only disclose information to other employees when it's necessary and authorized.
- Keep confidential documents inside our company's premises unless it's absolutely necessary to move them.

### You must not:

- Use confidential information for your personal benefit or profit.
- Disclose confidential information to anyone outside of our company.
- Replicate confidential documents and files and store them on insecure devices.

This policy is important for our company's legality and reputation. We will terminate any employee who breaches our confidentiality guidelines for personal profit.

We may also discipline any unintentional breach of this policy depending on its frequency and seriousness. We will terminate employees who repeatedly disregard this policy, even when they do so unintentionally.

## Harassment and violence

To build a happy and productive workplace, we need everyone to treat others well and help them feel safe. Each of us should do our part to prevent harassment and workplace violence.

### Workplace harassment

Harassment is a broad term and may include seemingly harmless actions, like gossip. We can't create an exhaustive list, but here are some instances that we consider harassment:

- *Sabotaging someone's work on purpose.*
- *Engaging in frequent or unwanted advances of any nature.*
- *Commenting derogatorily on a person's ethnic heritage or religious beliefs.*
- *Starting or spreading rumors about a person's personal life.*
- *Ridiculing someone in front of others or singling them out to perform tasks unrelated to their job (e.g. bringing coffee) against their will.*

Sexual harassment is illegal and we will seriously investigate relevant reports. If an employee is found guilty of sexual harassment, they will be terminated.

If you're being harassed, whether by a colleague, customer or vendor, you can choose to talk to any of these people:

- **Offenders.** If you suspect that an offender doesn't realize they are guilty of harassment, you could talk to them directly in an effort to resolve the harassment. This tactic is appropriate for cases of minor harassment (e.g. inappropriate jokes between colleagues.) Avoid using this approach with customers or stakeholders.
- **Your manager.** If customers, stakeholders or team members are involved in your claim, you may reach out to your manager. Your manager will assess your situation and may contact HR if appropriate.
- **HR.** Feel free to reach out to HR in any case of harassment no matter how minor it may seem. For your safety, contact HR as soon as possible in cases of serious harassment (e.g. sexual advances) or if your manager is involved in your claim. Anything you disclose will remain confidential.

## Workplace violence

Violence in our workplace is a serious form of harassment. It includes physical and sexual assault, destruction of property, threats to harm a person or property and verbal and psychological abuse. We want to avoid those incidents altogether, but we also want to be ready to respond if needed.

For this reason, we ask you to:

- *Report to HR if you suspect or know that someone is being violent. Your report will be confidential and we will investigate the situation with discretion.*
- *Call our building's security if you witness incidents of severe physical violence (e.g. ones that involve a lethal weapon.) For your safety, avoid getting involved.*

We will treat employees who verbally threaten others as high risk and they will receive an appropriate penalty. If HR finds that an employee commits an act of violence, we will terminate that employee and possibly press criminal charges. Employees who damage property deliberately will be solely responsible for paying for it.

### *Supporting victims*

To support victims of workplace violence, we may:

- *Cover relevant medical bills.*
- *Pay for mental health treatment if needed.*
- *Provide victims with our lawyer's services to help them file lawsuits.*

### *Get help early on*

Seek help from others early on to mitigate conflicts. For example:

- If you experience conflicts with a colleague, ask your manager for advice before tensions escalate. If these conflicts persist, ask HR whether you could attend conflict resolution seminars with your colleague.
- If you are experiencing personal or work troubles, ask for help from a *[mental health professional.]* Check with your insurance provider to determine whether they cover any mental health services or ask HR for information on our Employee Assistance Program (EAP). Your discussions will remain confidential.

Our workplace is founded on mutual respect and we won't allow anyone to compromise this foundation.

# Workplace safety and health

Our company is committed to creating a hazard-free workplace. To this end, we will ensure workplace safety through preventative action and emergency management.

## Preventative action

Preventative actions are any actions we take to avoid injuries or illnesses related to the workplace. We will periodically conduct risk assessments and job hazard analyses through a workplace safety committee to uncover health risks to employees. And we will establish preventative measures to address risks accordingly.

At a minimum, we will:

- Hold employee training sessions on safety standards and procedures.
- Make sure employees who work in dangerous locations are safe.
- Provide protective gear like gloves, protective uniforms and goggles.
- Direct inspectors and quality control employees to evaluate equipment and infrastructure regularly.

We also expect you to take safety seriously. Always use protective equipment and follow standards whenever necessary. If you deliberately disregard our guidelines, we may terminate you for your own and others' safety.

## Emergency management

Emergency management refers to our plan to deal with sudden catastrophes like fire, floods, earthquakes or explosions. Our emergency management provisions include:

- Functional smoke alarms and sprinklers that are regularly inspected.
- Technicians (external or internal) available to repair leakages, damages and blackouts quickly.
- Fire extinguishers and other fire protection equipment that are easily accessible.
- An evacuation plan posted on each floor and online.
- Fire escapes and safety exits that are clearly indicated.

## Smoking

Cayo Holdings Private Limited is a smoke-free workplace. We consider smoking at our premises is a serious offense. If you are found responsible, you may face disciplinary action up to and including termination.

## Drug-free workplace

Cayo Holdings Private Limited is a drug-free workplace. Whether you are an employee, contractor or visitor, you must not bring, use, give away or sell any drugs on company premises. If you are caught with

illegal drugs, or show that you are under the influence of substances, you will face disciplinary action up to and including termination.

### *Alcohol*

We prohibit employees from consuming alcohol during working hours, but they may consume alcoholic drinks in moderation at company events.

### *Prescription drugs*

If you feel that a prescription drug (e.g. an anxiety medication) unexpectedly affects your senses, thinking or movement, ask for the rest of your day off. If your manager suspects substance abuse, you may face disciplinary action.

You *must not* use medical marijuana in our workplace. We have the right to terminate you if your off-duty use of medical marijuana makes you unable to complete your job duties correctly.

We expect employees who hold safety-sensitive jobs (e.g. machine operators or drivers) to be fully alert and capable of performing their duties at all times. We may terminate you if we conclude your prescription drug use creates severe safety risks. If you need to use prescription drugs for a limited time and you think they may impair your abilities, use your PTO or sick leave.

If your job includes secondary tasks that are safety-sensitive and your prescribed drugs affect your ability to perform these tasks, we can make reasonable accommodations to ensure you and your colleagues' safety.

### *Dealing with addiction*

Being sober is a prerequisite to thriving at our company and we want to help you as much as possible. We offer Employee Assistance Programs (EAP) that can help employees overcome addictions. If you face a relevant problem, please reach out to our *EAP Officer*.

We won't tolerate substance addiction that results in violent, offensive or inappropriate behavior.



# EMPLOYEE DRESS CODE POLICY

## Formal Dress Code Policy (Monday – Friday)

Cayo Holdings Private Limited expects employees to dress appropriately in business attire. Because our work environment sees frequent visits from customers, clients, and the public, professional business attire is essential for our reputation. The formality of our business attire makes clients and customers feel that they can trust our judgment and recommendations.

Proper business attire for men includes suits that are typical of formal business attire at work. For women, business attire includes suits and sarees appropriate to a formal business attire environment.

Employees are expected to demonstrate good judgment and professional taste. Courtesy of coworkers and your professional image to clients should be the factors that are used to assess that you are dressing in business attire that is appropriate.

We will deal with employees who wear business attire that is deemed inappropriate in this workplace on an individual basis rather than subjecting all employees to a more stringent dress code for appropriate business attire.

## Business Casual Dress Code (Saturday)

Cayo Holdings Private Limited expects employees to dress appropriately in business casual attire. Because our work environment serves customers, professional business casual attire is essential. Customers make decisions about the quality of our products and services based on their interaction with you.

Consequently, business casual attire includes suits, pants, jackets, shirts, skirts and dresses that, while not formal, are appropriate for a business environment.

Examples of appropriate business attire include a polo shirt with pressed khaki pants, a sweater and a shirt with corduroy pants, a jacket with a skirt or slacks and a blouse or a sweater with a skirt or pants. Pantsuits and sports jackets also fit the business casual work environment if they are not too formal.

Jeans, t-shirts, shirts without collars and footwear such as flip-flops, sneakers, and sandals are not appropriate for business casual attire.

Employees are expected to demonstrate good judgment and professional taste. Use courtesy towards coworkers and your professional image to customers as the factors you use to assess whether you are dressing in business attire that is appropriate.

Employees who wear business attire that is deemed inappropriate in this workplace will be dealt with on an individual basis rather than subjecting all employees to a more stringent dress code for appropriate business attire.

## Casual Dress Code (Out Reach Events)

Cayo Holdings Private Limited expects employees to dress appropriately in business attire of a casual nature. Our work environment for employees encourages employees to dress comfortably for work. Please do not wear anything that other employees might find offensive or that might make coworkers uncomfortable.

It includes clothing with profane language statements or clothing that promotes causes that include, but are not limited to, politics, religion, sexuality, race, age, gender, and ethnicity.

Our goal is to provide a workplace environment that is comfortable and inclusive for all employees. We expect that your business attire, although casual, will exhibit common sense and professionalism.

Employees are expected to demonstrate good judgment and professional taste. Courtesy towards coworkers and your professional image to coworkers are the factors you need to use to assess whether you are dressing in business attire that is appropriate.

We will deal with employees who wear business attire that is inappropriate in this workplace on an individual basis rather than subjecting all employees to a more stringent dress code for appropriate business attire.

## Policy Revision

We will always strive for fairness and equal opportunity and penalize offensive and illegal behaviors. But, as laws and our environment change, we may revise and modify some of our policies.

We have established an annual revision of our handbook to bring it up to date with legislation and employment trends. We also ask you to contact HR if you spot any inconsistencies or mistakes. And, if you have any ideas about how to improve our workplace, we are happy to hear them.

## Employee acknowledgement

Please sign this form to acknowledge that you've read this handbook and that you are committed to following our policies. If you need any clarifications, feel free to ask HR.

Date: .../.../...

.....

# **Amendments 01/08/2021**

## **GUEST RELATION OFFICER DRESSCODE**

1. Guest relation officers and executives are allowed three dress codes in total.
  - a. Saree which provided by Cayo Holdings (Pvt) Ltd
  - b. Casual wear which provided and suggested by Cayo Holdings (Pvt) Ltd
  - c. Smart office wear suggested by Cayo Holdings (Pvt) Ltd
2. Saree (Would represent by Cayo Holdings (Pvt) Ltd them color), Should not violate the company policy related to dress code.
3. Casual wear (Cayo T-shirt) should wear only designated days which provided by the company dark blue or black trouser, pant or denim, Girls wearing ponytail, shoes (Sneakers, sportswear, court shoes, covered shoes with heels)
4. Smart Office wear should wear on designated days of the week with colors which advised by the administration and with high heels.

## **PROMOTIONAL OFFICER DRESSCODE**

1. For gent smart casual or smart office wear with or without a tie will be the dress code.
2. For ladies smart Office wear should wear on designated days of the week with colors which advised by the administration and with high heels.
3. For ladies casual wear (Cayo T-shirt) should wear only designated days which provided by the company dark blue or black trouser, pant or denim, Girls wearing ponytail, shoes (Sneakers, sportswear, court shoes, covered shoes with heels)

## **SPECIAL CONSIDERATION**

1. All the Guest relation related staff should wear masks, face protectors during pandemic periods while working.
2. Mask is must unless during personal space
3. Wear gloves in situations
4. All the PO's should wear a mask all the time and face protector while dealing with customers