

# ERIS Code of Conduct

*“Failures comes only when we forget our ideals, objectives and principles”.*  
Jawaharlal Neru

The ERIS (Company) Code of Conduct is the framework that explains the behavior Company expects of every employee and stakeholder. It is based on Company business principles: responsibility, respect and determination.

Company employees and stakeholders apply these business principles to their work and actions on a daily basis. Our principles are about providing our customers affordable products and services without compromising on quality or reliability. But they are also about doing the right thing more generally – following the law, acting honorably and treating each other with respect.

We expect all of our employees to read, acknowledge, and follow the Company Code of Conduct. Failure to do so will result in disciplinary action, and may lead to termination of employment with Company.

Additionally, we expect Company third parties, consultants, contractors, and anyone assigned to provide temporary work or services, to follow the Code of Conduct in connection to their work for our company. Failure to do so may result in termination of their relationship with Company.

It is imperative to Company that our suppliers, who we regard as our “extended enterprise,” conduct business respectfully and with a high standard of integrity, in line with the Company business principles.

## **We focus on quality.**

We strive to help our customers gain a competitive advantage by adding value through the performance and quality of our power and automation technologies and services.

## **We win trust by being honest.**

We have to build each customer’s trust through the integrity of our words and actions. We don’t promise what we can’t deliver, and strive to ensure that customers, shareholders and colleagues trust us to keep our word.

### **We compete fairly.**

We believe in a competitive because it guarantees that our hard work and innovation will be rewarded. We will lose the trust of our customers if we treat them differently from one another or conspire with competitors against them.

### **We refuse to make improper payments.**

Company reputation for honesty and integrity must not be put at risk by the offer of improper payments. In dealing with public officials, political parties or their officials or any private sector worker, Company employees must neither offer, promise or give any undue financial or other advantage, whether directly or through intermediaries, to obtain or retain business or any improper advantage in the conduct of business.

### **We protect our credibility by shunning gifts and favors.**

Accepting gifts and entertainment from business partners or offering such favours undermines our credibility. It makes Company vulnerable to accusations that business decisions are influenced by factors other than merit. Employees must therefore not offer, make, seek or accept gifts, payment, entertainment or services to or from actual or potential business partners which might reasonably be believed to influence business transactions, which are not within the bounds of customary business hospitality or which are prohibited by applicable law.

### **We are respectful of the company's assets.**

Company strives to give employees the tools they need – equipment and information – to be effective. Company physical assets, intellectual property rights and information must be handled with care to avoid loss, theft or damage. Information assets include organizational charts, technologies and processes, manufacturing methods, as well as marketing, advertising, and business development studies and plans. Company assets are intended to be used for business purposes. Limited personal use is only permissible if it is not in conflict with the interests of Company, this Code of Conduct, or Company rules and policies.

### **We use information systems professionally.**

Information systems should be used only for business purposes, in a manner that does not violate the rights or interests of the Company. Communication via e-mail could be regarded as a statement of Company. Employees must be careful not to release information that is commercially sensitive or

contentious, or may have undesired contractual or other legal implications for Company. All laws governing copyright, defamation, discrimination and other forms of written communication also apply to online and e-mail communication. Unauthorized or unlicensed software must not be placed onto Company facilities. Information produced and stored on Companies information systems is regarded as Company property, and ABB reserves the right to access all such information except where limited by law or agreement.

#### **We safeguard confidential information.**

Information is an asset. We share some of it in press releases, product information and other public documents. Any other information that comes to employees in connection with their work, whatever the source, must be kept confidential to prevent others copying our work or poaching customers. It may also include information that suppliers, customers or partners may have entrusted to Company. Mark information appropriately, keep it secure, and limit access to those who need to know in order to do their jobs. Avoid discussing information in areas where you may be overheard. We ask any outside party given access to confidential information to sign a confidentiality statement.

#### **We respect the intellectual property.**

Company protects its own secrets and respects the intellectual property rights of others. Employees must not obtain confidential information of other parties by improper means, or disclose it without authorization.

#### **We avoid and manage conflicts of interest.**

Conflicts of interest can arise where personal interests or family and other allegiances are at odds with the interests of the company. We can avoid conflicts of interest if we are aware of the challenge and take the necessary action. In general, we should avoid situations in which personal interests, outside activities, financial interests or relationships conflict or appear to conflict with the interests of Company, and not allow business dealings on behalf of the company to be influenced by personal considerations or relationships.

Employees who think they may be in a “conflict” must inform their manager or human resources representative so that the company can determine whether a conflict exists. Employees will be advised of the proper actions to take.

#### **We comply with anti-money laundering rules.**

Companies commitment to fairness, honesty and openness extends to complying fully with all money-laundering laws throughout the world. Employees must protect the integrity and reputation of Company by helping to detect possible money laundering activities. They should learn to watch for warning signs, which may include customers who are reluctant to provide complete information or wish to make payments in cash.

#### **We are fair in our relations with suppliers.**

Company expects fair competition in its markets and applies the same standard in dealing with suppliers. If you select and/or deal with suppliers, you should not show any favor or preference to any person or business based on anything other than the best interests of Company. You must not let your business dealings on behalf of the company be influenced by personal or family interests. Similarly, all purchases of goods and services for Company must be made in accordance with company policies.

#### **We cooperate fully with officials.**

Company's employees must be truthful and accurate in interactions with government officials, and observe the highest ethical standards when conducting business with government representatives. In dealing with a government, employees are responsible for knowing and complying with applicable laws and regulations, and must not contact government officials on behalf of the company unless it is their job.

#### **We let employees contribute to public affairs in their own time.**

Employees are free to contribute to a political candidate or party using their own personal time, money or other resources. Company funds, property or services must not be used to support any candidate for political office, political party, official or committee anywhere in the world. Any exceptions to this rule must be cleared in advance with company legal.

#### **Our internal communication.**

Our most important resource is its employees -- our people whose skills, energy and commitment to excellence and the Company's vision and values are the source of the Company's character and central to its leadership and success. Regular communication between managers and their teams is key to business success. This communication, which usually takes the form of meetings and briefings, should cover business strategy, long-term objectives and short-term priorities.

#### **We respect the individual and diversity.**

The Company recognizes the dignity of each individual, respects each employee, provides compensation and benefits that are competitive, promotes self-development through training that broadens work-related skills, and values diversity and different perspectives and ideas.

#### **We respect personal privacy.**

Employees must collect, use, store, handle, and disclose individual personal information in accordance with the Company privacy policies and applicable laws. Subject to local legislation, Company is authorized to supervise the use of e-mail and the Internet. All e-mail and Internet communications made through Company facilities are treated as Company business information, and so may be accessed, retrieved, monitored and disclosed by Company.

#### **We work to create an environment free of harassment.**

Harassment can take many forms. People may feel harassed by slurs, intimidating or aggressive acts or words, by derogatory jokes or inappropriate gestures, or by unwelcome physical or verbal conduct. Harassment can also be the communication or display of offensive material linked to any of the aspects of diversity mentioned above, such as gender, religion, race, nationality, sexual orientation or physical ability. Employees won't feel welcome and comfortable if they faces harassment. Harassment – be it face-to-face, written, electronic, or verbal – won't be tolerated.

#### **We set the high health and safety standards.**

It is our duty to our colleagues, their families and their communities to safeguard the health and safety of every employee at work. Company stringent health and safety policies and reporting requirements are in place to protect the lives and good health of employees. It is also imperative to report dangerous conditions and other unacceptable health, safety or environmental conditions immediately so that workplace accidents are minimized and corrective actions can be taken. Employees are expected to be familiar with the law as it applies to their job, and management is expected to provide necessary instruction and advice. Due to the complex regulatory framework within which Company conducts business, issues of legal compliance may arise. On occasion, there may be disagreement on whether Company is in full compliance with the law and litigation may occur. At all times Company will act responsibly and abide by the final decisions rendered by the courts.

#### **We support environmental responsibility.**

All Company employees have the responsibility to comply with the letter and the spirit of environmental laws and regulations, and respect the environment wherever they work.

## Non-compliance reports politics

All employees are required to report any suspected or observed violations of the law, of this Code of Conduct, or of company policies – or if they are asked to do something that might be a violation. Employees must be aware, however, that anonymous reports may be more difficult to investigate.

Confidentiality will be maintained to the fullest extent possible. Retaliation against any employee who in good faith reports a concern to the company about illegal or unethical conduct will not be tolerated, and will be subject to disciplinary action. The same applies to any intentional abuse of these reporting processes.

Employees who have questions about a specific situation should ask for help by using any of the aforementioned contacts. The key is to speak up and bring concerns into the open so that problems can be resolved quickly before serious harm can occur. It is also a breach of this Code of Conduct to fail to report a violation or suspected violation that employees know about, or to refuse to cooperate with the investigation of a suspected violation.

## Penalties for violation

Each employee is responsible for ensuring that his or her conduct and the conduct of anyone reporting to the employee fully comply with the applicable laws, this Code of Conduct, and the company policies. Compliance and integrity, both personal and by subordinates, will be a factor in periodic performance appraisals. ERIS applies “zero tolerance” and will take disciplinary action, up to and including termination of employment, against employees who violate the law, this Code of Conduct or company policies.