



CODE OF CONDUCT

PURPOSE

It is vital to the financial success of NSHM that we conduct our business with integrity and honesty, and in compliance with all applicable legal and regulatory requirements.

This Code of Conduct sets out the fundamental standards to be followed by employees in their everyday actions on behalf of the Company. Further guidance on the Company's standards in specific areas will be provided through related corporate policies and guidelines.

SCOPE

This policy applies to all employees, within all portal, regions, areas and functions.

POLICY

Each *NSHM employee* must:

- I. Conduct the Company's business with honesty and integrity and in a professional manner that protects the Company's good public image and reputation.
- II. Build relationships with customers, vendors and fellow employees based on trust and treat every individual with respect and dignity in the conduct of Company business.
- III. Become familiar with and comply with legal requirements, Company's policy, and procedures.
- IV. Avoid any activities that could involve or lead to involvement in any unlawful practice or any harm to the Company's reputation or image.
- V. Avoid actual or potential conflicts of interests with the Company, or the appearance thereof, in all transactions.
- VI. Provide accurate and reliable information in records submitted, safeguard the Company's confidential information, and respect the confidential information of other parties with whom the Company does business or competes.
- VII. Promptly report to the Company any violations of law or ethical principles or Company policies that come to the employee's attention, and cooperate fully in any audit, enquiry, review or investigation by the Company.

- VIII. If such requested information is legally privileged the employee must contact the Legal Department before responding to the request.

RESPONSIBILITY

- I. All employees must uphold these standards in the conduct of Company business and the Company must handle, in a manner consistent with these standards and related policies, all actual and apparent conflicts of interest between personal and professional relationships and all other matters governed by this Code and such related policies.
- II. If a decision about a particular action is not covered specifically by this Code or related corporate policies, employees are required to seek guidance from the Human Resources Department.
- III. Senior management should be a role-model for these standards by visibly demonstrating support and by regularly encouraging adherence by managers. Leaders should ensure all their employees receive guidance, training and communication on ethical behavior and legal compliance relevant to their duties for the Company.
- IV. Failure by any employee to comply with this or any NSHM policy will subject employees, including leaders who ignore prohibited conduct, or have knowledge of the conduct and fail to correct it, to disciplinary action up to and including separation from employment with the Company.
- V. When in doubt as to the correct action to take, ask the following question. "Would I feel comfortable in explaining this action to my family or close friends or seeing my action reported on the front page of the local newspaper?" The Company is best served when each employee's answer to this question is an unqualified, "Yes."

"I agree to the Code of Conduct"

Name: *Dr. Alok Satsangi*

Alok Satsangi
Signature:

Date: *31/10/2018*