



Code of Business Conduct and Ethics

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QHSE/A Annexure 08	04	28 Jan 2025	Name & Signature: Durairaj N. Executive Vice Presedent 	Name & Signature: Sir Sohan Roy S.K. Founder Chairman & CEO 
			Date: 28 Jan 2025	Date: 28 Jan 2025

A Message from the Chief Executive Officer

We, Aries Group recognize that individuals have an instinct when it comes to understanding what constitutes Ethical Business Conduct. We are committed to maintaining the highest standards of Ethics and Integrity in all of our activities, and the attached Code of Business Conduct and Ethics reflects the practices and principles that support this commitment.

Efficiency-oriented Management System is our Core Policy and it is made possible by following the strict guidelines through our Effism software module for our day-to-day activities. We do follow the 24-hours response policy on all inquiries/instructions / NCRs for rectification or responses to resolve the issues as and when it comes. Our Business Ethics Code of Conduct guides all of us, regardless of whether we are a member of the Board of Directors or working in one of our offices. You must be familiar with the Code so that you can apply its principles in your daily work activities. We must always remember that our reputation and our future success depend on how we conduct ourselves and the decisions we make each day.

Dedication to these principles provides the foundations necessary for maintaining Aries Group's positive reputation and continued success in the business community. This Code is intended as a supplement to Aries Group's existing policies and procedures, as amended from time to time, and not as a replacement. When no single document can address every situation, this code provides clear guidance on critical issues. When facing a situation not covered by the Code, we expect our people, regardless of the job position, to exercise good judgment and especially seek guidance in resolving potential issues.

You should familiarize yourself with this Code of Conduct and keep it handy for future reference. The Code anticipates that Top management and employees adhere to all of Aries Group's policies and procedures, the violation of which may be interpreted as a violation of the Code.

I hereby ask each one of you to review this Code of Business Conduct and Ethics as well as the Business Principles and join us in making a personal commitment to using it to guide your work. Continued success relies on the dedication of everyone to these core principles. Working together, we must uphold and demonstrate the highest levels of business excellence and ethics that our customers, stockholders, and employees expect from us.

Sincerely,



Sir Sohan Roy S.K.

Founder Chairman & CEO

Introduction

This Code of Business Conduct and Ethics applies to Aries Group and all of its associate organizations, as well as all employees of these entities, including temporary workers, suppliers, and vendors. We expect our business partners to apply similar standards of business conduct. This Code applies anywhere in the world, including countries where local laws are less stringent or where day-to-day business life may seem to accept behavior that is not allowed under this Code. Understanding and complying with our Code of Business Principles is a condition of employment.

This Code of Business Conduct and Ethics applies to the following areas:

1. Compliance with Applicable Laws and Regulations
2. Client Focus
3. Safety and Health
4. Alcohol and Substance Abuse
5. Integrity and Transparency
6. Forgery, Falsifying Accounts, Documents, and Records
7. Anti-Bribery and Corruption
8. Conflicts of Interest
9. Confidentiality
10. Social Media Usage
11. Respect for Society, Environment, and Human Rights
12. **Anti-Harassment**
13. Grievance Handling
14. Equal Opportunities
15. Child & Forced Labour
16. Fair Competition
17. Reporting Violations

01. COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

At Aries Group, we conduct our business in compliance with all laws and regulations that apply to our business, in all countries in which we operate. Where there is any inconsistency between this Code and applicable laws and regulations, Aries Group will follow the law of the land.

02. CLIENT FOCUS

“Time is Money We Count Even Seconds” shall reflect on our services to make our clients happy. The additional care for Clients due to “Family” bonding in the “Society” based management principle shall be displayed in our Client’s dealing. Ensure “ZERO” tolerance of any conspiracy affecting the smooth operations of the organization or the relationship with any of our clients. Punctuality shall be a part of all Aries Employees’ routine activities to make our clients happy. We ensure to make our clients happy through our Quality services in a cost-effective way on time; it is our Business Motto.

03. SAFETY AND HEALTH

Aries Group is committed to providing a safe work environment where no one is subject to any unnecessary risk. In practice, we expect everyone involved to respect and observe applicable safety rules, procedures, and guidelines that aim to protect the health and safety of themselves and others.

To preserve a safe working environment, employees should:

- Never work in an unsafe area.
- Stop any work that becomes unsafe.
- Never work without safety gear as required.
- Only perform work for which you have been properly trained.
- Only perform work that you are medically able to perform.
- Make sure you know what to do if an emergency occurs.
- Ensure that others working around you are working safely.

- Promptly report to management any accident, injury, illness, incident, spill, or release, so that steps can be taken to correct, prevent, or control those conditions immediately.
- If you have any concerns about the safety of a particular task or working condition, do not hesitate to bring your concern to your immediate supervisor or management.

04. ALCOHOL AND SUBSTANCE ABUSE

Aries is committed to providing a work and business environment that is free of alcohol and substance abuse. Accordingly: Under no circumstances should any employee:

- Undertake work when your performance would be impaired by alcohol or other drugs, legal or illegal, whether or not such drugs have been prescribed to you.
- Possess, use or transfer illegal drugs or other substances on Company premises and Company provided Accommodations at any time.
- Threaten, intimidate, or engage in any violence towards another person at work; or Bring any weapon onto Company premises.
- As we are all responsible to maintain a healthy and safe workplace, we should take reasonable steps to prevent any co-worker, customer, supplier, or other guests from driving while impaired/intoxicated, and should immediately report the situation to an Admin Head.

05. INTEGRITY AND TRANSPARENCY

We will work following good corporate governance principles. We conduct our business fairly and professionally, with integrity and honesty, and following this Code of Business Conduct and Ethics. All transactions, payments, and receipts on behalf of our company must be properly authorized. We keep correct and complete records regarding all our business activities, ensuring that our records properly reflect any underlying transactions. We ensure that timely, reliable, and relevant information is kept – and disclosed when necessary - regarding our activities, structure, financial situation, and performance, including environmental and social reporting, wherever applicable. This principle of integrity and transparency also includes our commitment to keeping confidential information and personal data secure, unless we have reasons and rights to disclose it.

06. FORGERY, FALSIFYING ACCOUNTS, DOCUMENTS, AND RECORDS

We shall not manipulate internal accounts or make entries to any account which are false, have not been properly verified or obscure the true nature of the transaction, or allow such entries to be made. Creating or reproducing or falsifying a signature or initial, or otherwise creating a false document shall not be tolerated under any circumstances.

We shall not intentionally complete inaccurate reports, forms, or other documents (including personnel/equipment certificates, marketing, and client presentation material) that are relied upon by ARIES to be an accurate record of the circumstances, or that are disclosed publicly or directly to third parties, including government agencies, regulators and customers or potential customers.

07. ANTI-BRIBERY AND CORRUPTION

We are committed to preventing, detecting, and interdicting bribery and corruption. Nothing justifies the crime of bribery and corruption. We never either directly or indirectly bribe, pay money or give expensive gifts or any other undue or unofficial advantage, neither in monetary form nor in kind (this includes facilitation payments); not to individuals or government officials nor corporations, groups, or organizations of whatever nature; not to attempt to secure business, not to secure a chance of business or favorable treatment, not to influence any act or decision and not to induce any act or omission thereof.

In turn, we never accept bribes, monetary payments, expensive gifts, or other undue or unofficial advantages of a third party where we should know or suspect that such offer is made with the expectation that it will create a business advantage in return. Furthermore, we do not induce, commit, tolerate or give in to extortion or any other form of corruption.

To help prevent and detect bribery and corruption, we are committed to taking appropriate measures. We do not enter into or maintain business relationships that are likely to induce breaches of this principle. We will ensure that the remuneration of our agents is appropriate and for legitimate services only. We shall adopt and maintain management control systems and disciplinary procedures that discourage bribery and corruption. Our accounting records and supporting documentation shall accurately reflect the nature of the underlying transactions.

08. CONFLICTS OF INTEREST

We require all our employees to refrain from any activity that could conflict with their responsibilities towards our company. Employees shall not seek or accept benefits for themselves or others through misuse of their position in the company. Employees shall not have an employment, consulting or other business relationship with a competitor, customer, or supplier of Aries Group and employees shall not act as or on behalf of a competitor, consultant, supplier, or other third parties towards Aries Group, except with explicit approval confirmed in writing. Situations, where the interests of an employee are inconsistent with his or her responsibilities towards Aries Group, must be reported to the management immediately.

09. CONFIDENTIALITY

Aries Group operations must safeguard information by keeping it secure, limiting access, and avoiding discussions or revealing such information in public places. Confidential or potentially confidential or sensitive information concerning Aries Group, its business, and competitors shall only be disclosed or used if expressly agreed in writing by Aries Group. Confidential information can be any non-public information in any form.

Aries Group activities constantly require the acquisition, storing, processing, communication, and dissemination of information, documents, and other data regarding negotiations, administrative proceedings, financial transactions, and know-how (contracts, deeds, reports, notes, studies, drawings, pictures, software, etc.) that may not be disclosed to outside parties according to contractual agreements, or whose inappropriate or untimely disclosure may be detrimental to the company's interest.

Aries Group is committed to protecting information concerning its People and third parties, whether generated or obtained inside Aries Group or in the conduct of Aries Group business, and to avoiding improper use of any such information.

Personal data must be processed lawfully and fairly. At any rate, data is collected and stored only when this is necessary for certain explicit and lawful purposes. Data shall be kept only for as long as necessary to fulfill the purposes for which it was originally collected.

Aries Group management and employees in charge of illustrating or disclosing data or news to the outside concerning the company's objectives, activities, results, and opinions, shall not only comply with company procedures relating to market abuse, but also obtain the necessary authorization from the concerned for the lines of action, documents and reports to be followed, and agree with the relevant Aries Group Corporate unit on the contents of the data or news to be disclosed.

10. SOCIAL MEDIA USAGE

We embrace the power of social media and its enormous role in the connected world. From Company and brand-sponsored Facebook sites to those employees who support customers on Twitter or other social networking sites, we use these sites to help connect as well as to help connect with our customers in a whole new way. Whenever we use social media, whether for work or for personal use that relates to the Company in some way, keep our social media guidelines in mind.

- We should not disclose or use confidential or proprietary information of Aries in any online social computing platform.

- We should not share any of our project details, project location, client details, client property details, etc. in any social media applications without prior consent.
- No information should be shared on social media which has the potential for leakage of the Client's information to our competitor.
- Under any circumstances, a threat resulting in job loss must be avoided.
- Unsafe Acts or unsafe work conditions (HSE violations), Incident reports, accident reports, and HSE data should not be shared on social media.
- Always respect safety signage at the project site, irrespective of any circumstances. Never take and share a photo where standing instruction is provided as "Taking photography is prohibited".
- We advise all of us to have the right etiquette in using social media within the limit and has to be of utmost importance in respecting the boundaries of others.

Social media networks, blogs, and other types of online content sometimes generate press and media attention or legal questions. Employees should refer these inquiries to the Top management of Aries Group. Avoid speaking as a representative of the company, if you are not authorized to do so.

We should make sure that our online activities do not interfere with performing our job responsibilities or commitments to customers.

Social networking during working hours is strictly discouraged unless instructed by Aries' Management for promotional, marketing, or recruitment matters.

If employees come across a situation while using social media that threatens to Company or its Jobs, Clients, or Employees, they should disengage from the dialogue politely and seek the advice of a Division Head.

11. RESPECT FOR SOCIETY, ENVIRONMENT, AND HUMAN RIGHTS

We respect the rights of others and we respect the world around us. We, therefore, aim to minimize air, water, and earth pollution and always take into account the need to minimize any impact on the environment. To protect the world around us, we fundamentally object to and refrain from violations of human rights and we strive to ensure that our activities do not make us an accessory to the infringement of human rights by others.

Charity shall be a part of our profession and shall progress from the heart by compromising our luxurious life to feel the taste of donations. It is the responsibility of every Aries employee to support the retired staff personnel who are not capable to work due to age/health factors or genuine personal reasons.

Continual improvement on responsibility handling shall be a mandatory policy in our management system, and at Aries, no one will be allowed to do the same job for more than 5 years. Management shall ensure that continual improvement is being implemented in the professional career of every employee.

We apply working hours and remuneration practices that are in line with prevailing industry norms.

12. ANTI-HARASSMENT

We do not encourage discrimination and harassment of any kind, against employees at any point in time. We assure an atmosphere of mutual respect for each employee and support the right of individuals to represent themselves.

- Unwanted mingling, especially across genders, can create discomfort and disrupt professionalism.



- To maintain a respectful workplace, it's essential to uphold boundaries, focus on work-related interactions and avoid personal questions unless welcomed.
- Observing non-verbal cues, like body language, helps gauge comfort levels, and brief, relevant interactions are often best if a colleague appears reserved.
- Self-awareness and empathy foster a culture of respect, where all colleagues feel comfortable and safe from unwanted attention.

13. GRIEVANCE HANDLING

In case, an employee is facing any kind of harassment from his/her co-worker, superior or elsewhere, they are free to discuss the matter with Top Management including CEO. A proper explanation will be derived from both the parties and upon verifying the authenticity of the complaint, the necessary warning will be generated against the person in question and documents will be filed accordingly in the concerned employee's file.

14. EQUAL OPPORTUNITIES

Our equal opportunity policy reflects our commitment to ensuring equality and promoting diversity in the workplace. We believe this policy is the pillar of creating a healthy and productive workplace that helps everyone feel supported and valued to work productively.

15. CHILD & FORCED LABOUR

We will not use child labor or any other illegal form of forced labor and we will not do business with any party that does not comply with this principle. Furthermore, we are committed to creating a working place where everyone feels responsible, safe, and free to develop themselves.

16. FAIR COMPETITION

We support and promote free and fair competition in all Aries Group operations across the world. We acknowledge the value of a level playing field for all businesses. Our customers have a right to enjoy the benefit of free and fair competition among their suppliers. Our suppliers have a right to such benefit with their competitors and Aries Group benefits from open competition among those who supply our businesses. We, therefore, comply with applicable competition / antitrust laws in all our dealings. We never collude with other tenderers, suppliers, or contractors or engage in any other form of anti-competitive behavior which may affect the Project. We always endeavor to provide the best value for money.

17. REPORTING VIOLATIONS

Aries Group shall monitor observance and compliance with this Code of Business Conduct and Ethics. Any concerns regarding violations of this Code that cannot be addressed with your immediate supervisor may be reported to the Corporate Admin head (admin@ariesgroup.ae). All reports shall be treated confidentially and will be dealt with diligently and appropriately, whilst protecting the identity of individuals as much as possible. Such reporters shall not suffer as a consequence of addressing the concerns in good faith.

Amendment History			
Rev. No.	Date	Details	Approved by
04	28 Jan 2025	ANTI-HARASSMENT regulations updated and Anti-Dowry Policy shifted to Aries HR Policy	Sohan Roy

03	01 Jun 2022	Anti-Dowry Policy added	Sohan Roy
02	01 Aug 2019	Clause number added; Social Media Usage policy was rewritten, Anti-Harassment; Grievance Handling; & Equal Opportunities Policy newly added	Sohan Roy
01	18 Sep 2016	CEO Letter; Client Focus; Respect for Society, Environment, and Human Rights	Sohan Roy
00	05 July 2016	Initial Issue	Sohan Roy
