

Intern Handbook



Directors' Message



Hello and welcome to the TresVista family!

We believe that each individual is a critical part of the team and has the potential to make TresVista a premier financial services Firm. Our team of Financial Services and Staff are true entrepreneurs, passionate about their contribution to TresVista and take complete ownership and responsibility for the direction the Company heads. We truly believe that each and every Person in the TresVista family is able to add value and contribute in their unique way to building our strong culture of integrity and excellence.

The TresVista culture of perfection is top down and there is a conscious effort to ensure that the Company culture is conserved and enhanced where possible. At TresVista, we recognize hard work, effort and sincerity displayed by the team. We believe in constantly challenging the individuals and motivating them to press ahead. When an individual, or we as a team, deviate from our desired standards, the responsibility is on all of us to get back on track and make this a Company we are proud to be a part of.

We still believe we are a small Company and as such there are no cracks to slip through. TresVista is continuously mentoring and cultivating team players who understand the importance of relationships. For better or worse, each individual's experience is shaped by the fact that we expect excellence at every step of the way. When we 'expect' excellence, it means we 'believe' the team is capable of it.

Someone once told us that what we ask of our team is like 'asking an Olympic long jumper to also be an Olympic marathon runner – it's not possible except for extraordinary people.' We responded in agreement – we aspire to be extraordinary. If you feel frustrated at times, if you experience 'failure' for the first time in a meaningful way, we hope at some point in the future, you can reflect on how much you have 'learned', and be proud of all you have accomplished and be excited by all you will accomplish. Over time, we hope you will see the positive changes in yourself.



We have tried to do our part in helping the development of each individual. The team's development will always be our responsibility and priority, but we believe that the team has adopted a culture of action and self-motivation which will allow one to achieve even more.

When we look at the quality of our team, our Clients, and our prospects, we are more excited than ever for the future of TresVista. We look forward to succeeding together!

Abilash Jaikumar

Sudeep Mishra



Disclaimer

Interns are required to abide by this Handbook and the policies herein, and any other rules, regulations, policies that may be released by the Management from time to time.

In order for the policies to remain current and relevant, the Intern Handbook is revisited at regular intervals and necessary modifications, or additions are made. In such cases, the eligible Interns are informed of any change. Further, each Intern is bound to observe and uphold all of the Company's policies and procedures as implemented or varied from time to time.

The provisions mentioned are indicative and in case of any conflict with the provisions of the internship Agreement, or any subsequent amendment or document the most recent document will prevail. Further, Subject to Law, all representations and undertakings related to any and all benefits being or to be extended to Interns pursuant to this Intern Handbook are on a best effort basis and may be rolled back at discretion of the Management. This document is intended for the internal use of recipients only and may not be distributed externally. Any reproduction for external distribution in any form without written permission from TresVista attracts penal actions.



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1. About TresVista

1.1 History

TresVista, along with its list of entities situated in India, Singapore, United States and United Kingdom, started in November 2006. It is a unique high-end financial service provider that meets Client needs by offering a diverse and in-depth suite of services. It provides financial advisory and consulting services to institutional Clientele across asset classes and industries with a reach that spreads across the globe. Financial sector Clients include private and public equity, hedge funds, investment banking, equity research, and fixed income Firms. TresVista has also worked across multiple sectors such as banking, logistics, telecommunication, solar power, media, manufacturing, and many more. Through its unique services model and culture, TresVista delivers excellence to Clients and Opportunity to its Employees and Interns, both with an aspiration to exceed expectations.

This Intern Handbook is applicable to all the Interns of TresVista's Indian entities.

1.2 Mission Statement

To be recognized as the highest quality financial and consulting services provider through:

- Building a team of industry leading talent
- Consistent dedication to excellence and quality
- Active participation in the growth and success of its Clients

1.3 PACT

The culture of TresVista is built on the founding pillars of the PACT.

People

'We recognize and value that people are unique and multifaceted. We give people the freedom to contribute to the Improvement of the Organization. We encourage creativity and support enthusiasm.'

Action

'We encourage active decision making and getting the job done. We act rather than react.'

Clients

'We strive to be close to the customer. We learn from the people we serve in order to continuously improve our quality.'

Team

'We succeed together.'



1.4 CSR

“We make a living by what we get, but we make a life by what we give”

Winston Churchill

Since its inception, TresVista has been committed to serving the community to which it belongs. The founders appreciate that the proper functioning and improvement of a society requires its Employees and Interns, both as individuals and as corporate citizens to take not only responsibility but also action.

The Company periodically organizes community service events at the Company level, where in all Interns are encouraged to participate. Besides this, Interns are encouraged to promote causes they are passionate about. The founders often participate in service events with individual champions of causes. TresVista also actively Partners with Organizations that promote social investment and entrepreneurship, whereby TresVista’s team members can leverage their financial skills for the benefit of NGOs and social entrepreneurs.

The small changes that can be made and witnessed, allow TresVista’s Interns to become more engaged and committed towards donating time and money for socially valuable causes. As a team, everyone at TresVista is encouraged to continue contributing to the community by putting in their best efforts.

1.5 Training

TresVista takes responsibility for the growth of its Interns, by providing enriching and valuable opportunities to learn at every stage of their internship program. Training at TresVista plays a pivotal role in their learning and development, knowledge sharing, and skill enhancement. The internship program aims to create a supportive and engaging learning experience that ensures holistic development by having a mix of technical, and soft skills training sessions and exposure to working on live projects. The training is carefully tailored to contribute to the success of the Company through focused learning so that the Interns can act as brand ambassadors post their internship with TresVista.

Internship Program

TresVista has a structured internship program to impart technical and process understanding among Interns. It also aims at disseminating the culture of TresVista

- All Interns undergo a mix of training sessions and work on live projects throughout their internship program
- The program is carefully curated by the Training department and respective departments in tandem
- Such training sessions may be conducted off-site or on the office premises
- The duration of the training ranges according to the department's requirement
- The training sessions are a mix of instructor lead induction/soft skill sessions, team/department/function-specific sessions, and technical sessions



Points to Note

- Team/department/function-specific training manuals are provided to the Interns before each session
- Interns are encouraged to refer to these manuals whenever required. All accesses given to refer to the training material are revoked once their internship concludes



2. Conduct and Ethics

Interns are expected to maintain high standards of professionalism as set by TresVista.

2.1 Work Ethics

TresVista aims at enhancing its reputation as a quality service provider and an enjoyable, stimulating and challenging place to work. It expects its Interns to achieve and maintain a high standard of ethics, professional conduct and work performance to ensure that TresVista maintains its reputation with all internal and external stakeholders. All Interns should note that:

- High ethical standards must be recognized and valued
- Any unethical or illegal behavior must be reported by the Interns to the Ethics Committee
- An environment of honesty, trust and integrity must be maintained
- TresVista's property must be maintained and not be damaged intentionally
- In all dealings with third parties, the policies and directions of this Intern Handbook must be complied with
- Any behavior or collective action which harms or could harm the integrity and/or interests of TresVista must be avoided
- Use of any Resources in connection with any illegal activity is strictly prohibited, and TresVista will cooperate with any legitimate Law enforcement investigation of potential criminal activity.

2.2 Adherence to Compliance Manual

TresVista expects all Interns to adhere to the Compliance Manual which is an integral document covering all internal compliance policies of the Company. Interns are expected to:

- Conform to the Compliance Manual and policies written therein, provided to them as a part of internship terms;
- Be aware of, and adhere to; all compliance related Company policies during their internship with TresVista and perform their duties with care and diligence, using authority in fair and equitable manner

TresVista may take actions including, but not limited to, policy reminder, termination of the internship for Interns who act in contravention of the TresVista Compliance Manual and/or Policies therein.

2.3 Inventions

The purpose of this policy is to protect TresVista's Intellectual Property rights i.e., to ensure that all Interns of TresVista have appropriately assigned their invention rights and ownership to TresVista.



Policy

- TresVista is not required to designate any Intern as the author of any invention during the period of their internship period with the Company
- All Inventions created by an Intern during their internship with the Company are exclusively owned, legally and beneficially, by the Company and are dealt with or assigned to account in such manner and/or on such terms as the Company considers appropriate
- In addition, an Intern must assign to the Company any rights, title, and interest to Inventions created by them when not carrying out their duties, but which are materially connected with those duties and may be of material value to the Company
- An Intern must disclose all Inventions to their reporting authority and at the Company's request, must do all things that may be necessary and appropriate to establish a perfect record or document the Company's ownership of the Inventions including, but not limited to, the execution of the appropriate Copyright or Patent applications or assignments, the production of documents and evidence to the appropriate authorities, etc. and assist the Company in taking action in relation to any possible infringements
- All rights, title, ownership, and interest in any Intellectual Property (as defined below) arising out of or in connection with the Intern's internship with the Company, whether or not created, conceived, or developed in the Company's premises or using the Company's property, and all other proprietary rights therein or otherwise subsisting now or in the future, shall vest solely with and be the property of the Company
- The Intern will execute all documents and perform all acts at the Company's request, without any additional remuneration or payments of any kind, to establish or preserve the Company's right to such Intellectual Property including execution of deeds of assignment or any other document as may be required during the course of their internship or at any time thereafter. The Intern hereby appoints the Company and its nominated officers as their authorized attorney and agent to execute documents on their behalf for this purpose
- The Intern hereby irrevocably and unconditionally waive in favour of the Company all rights granted by the Indian Copyright Act, 1957 in connection with their authorship of any Copyright works in the course of their internship with the Company, including without limitation any moral rights and any right to claim an additional payment with respect to use or exploitation by the Company of those works. It is clarified that section 19(4) of the Indian Copyright Act, 1957 shall not apply to any assignment of Copyrights under this Agreement and the Intern hereby agrees not to raise and waive all rights to raise, any objection or claim before the Indian Copyright Board with respect to the assignment pursuant to Section 19A of the Indian Copyright Act, 1957
- **It should be noted that:**
 - An Intern does not and shall not at any time have any rights, title, or claim in or to any Inventions



- An Intern retains no right to use the Inventions. Further, they must not challenge the validity of the Company's ownership of the Inventions
- The decision on whether to Commercialize or market any Inventions developed by an Intern solely or jointly with others is within the Company's sole discretion and for the Company's sole benefit
- No Royalty is due to the Intern as a result of the Company's efforts to Commercialize or market any such Inventions
- If an Intern has any right to the invention that cannot be assigned to the Company as a matter of Law, such as moral rights, author's rights, rights of integrity or any similar rights, the Intern must unconditionally and irrevocably waive such rights in the invention, including without limitation, the right to the integrity of the invention that they may enjoy in respect of the said invention, in favor of the Company and further grant to the Company the right to modify the Inventions as the Company deems fit
- Further, an Intern must unconditionally and irrevocably waive the enforcement of such rights, and all claims and causes of action of any kind against the Company with respect to such rights, and agree, at the Company's request and expense, to consent to and join in any action to enforce such rights
- The Intern's stipend is full compensation for their services and all present and future uses of Intellectual Property made by them in the course of their internship and they will not make any claims against the Company or any of its affiliates with respect to such Intellectual Property; and
- The Intern shall not use, reproduce, or share in any manner whatsoever (including through social media) names, logos, trademarks, signs, signifiers or other representations of the Company, its affiliates, Clients, suppliers, and agents without the Company's prior written authorization; and
- The Intern shall not violate or infringe or disclose and use without written authorization any third-party Intellectual Property rights during their internship with Company
- The provisions of this clause shall survive the termination of the internship agreement

2.4 Conflict of Interest – Firmwide Applicability

TresVista is committed to conducting business in a manner that ensures Intern's business judgment and decision making are not influenced by undue personal interests. Given the possibility of a conflict of interest (actual, potential, or perceived) in the context of the nature of services provided by TresVista to its Clients, TresVista requires all Interns to comply with Company guidelines and make all relevant disclosures to prevent any such conflicts of interest (actual, potential, or perceived)

Eligibility

This policy is applicable to all Interns.



Particulars

Per the policy, conflict of interest situations include but are not limited to:

- Owning more than 1% stake in a Company (private or public), sole proprietorship Firm or partnership Firm (registered or unregistered)
- Partnership or Directorship in a private or public Firm:
 - Director or a Partner in any other Firm
 - Power of Attorney of any other Firm
 - Sleeping Partner in a business run by another individual
- Multiple internship leading to monetary benefit:
 - Side business
 - Part-time internship
 - Weekend jobs
 - Monetary benefit from any internship apart from TresVista
- Freelance activities:
 - Freelancing, irrespective of the area of expertise, location, and timing
 - Working on a contract (temporary or renewal basis)
 - Giving lectures or teaching online or offline, irrespective of the topic (e.g., Alma Mater, CFA tutor, Finance tuitions, etc.)
 - Collaborating with institutions to give lectures
 - Providing professional consultation services to other Firms
 - Blogging to generate online traffic and/or marketing Products online
 - Referring a vendor Company in which an Intern has vested interest
- Other types of conflict:
 - Failing to disclose that the candidate, the Company is considering hiring is an immediate blood relative or spouse
 - Failing to disclose information pertaining to immediate blood relative or spouse working with a competitor
 - Engaging in business or working for a competitor
 - Working for an organisation that provides a competing Product or service
 - Direct or indirect interest in any activity or business, resulting in monetary gain, whose nature of business is similar to TresVista

For the purpose of this policy, the term 'competitor' shall include any outsourced financial services provider or any Organization whose nature of business is similar to that of TresVista, including but not limited to Financial Services, Data Intelligence, CFO Office Services.



Conflict Disclosure and Resolution Mechanism

1. Conflict of Interest (COI) Committee

- Shall assess and evaluate any conflict situation reported by Interns to avoid or minimize the risk associated with any conflict of interest (actual, potential, or perceived)
- Comprises of senior members of the Firm who will review all reported conflicts of interest
- Is responsible for:
 - Identifying whether a conflict exists
 - Evaluating the severity of the conflict
 - Communicating to the Intern, the steps necessary to resolve the conflict

2. Procedure

- Interns are required to declare any conflict of interest (actual, potential, or perceived) situation to the COI Committee and seek the Committee's approval before entering into any situation that may be deemed as a conflict of interest
 - Such instances can be raised with the COI Committee via a Helpdesk Ticket or via the following email ID coicommitee@tresvista.com
- The Committee shall proceed to make an enquiry into cases brought to its notice:
 - The COI Committee will review the case and communicate their decision to the concerned Intern within one month of the case being presented
 - In the interim, the concerned Intern shall refrain from participating or continuing with the conflicting arrangement
 - The Intern will need to implement the Committee's recommendation within two weeks of being communicated of the Committee's decision
 - The COI Committee may ask the Intern to submit supporting documentation/evidence related to the conflict of interest at different stages of the review process in addition to seeking proof of the implementation of the corrective action recommended by the Committee
 - The decisions and recommendations of the Committee shall be binding upon the Intern. Failure to abide by this may result in Termination with Cause (Refer to section 7.2 of this Handbook)

3. Exceptions

- An event or any act of an Intern that does not jeopardize the primary interest of the Intern towards TresVista shall not be categorized as a Conflict of Interest
- However, all such cases must be reported to the COI Committee, who will review it and may deem it as an exception (Subject to approval from the COI Committee). There are certain activities which may not be a potential conflict, including but not limited to:
 - Volunteering for a non-profit Organization over the weekend



- Serving on the Board of Directors of any Company with no conflict of interest in context of the nature of services provided by TresVista to its Clients
- Conducting guest lectures on weekends without using TresVista's confidential and proprietary information

2.5 Conflict of Interest – Delivery Teams Applicability

The purpose of this policy is to establish relevant principles and rules for preventing or managing conflicts of interest in the Organization and to explain how such principles and rules are implemented.

Scope

This policy applies to all Interns of TresVista.

Particulars

- **Conflict of Interest:**
 - Conflict of interest would arise in the situation wherein a department/team has one or more Interns assisting Clients:
 - Working together on the same deal
 - Competing against each other
 - Across the table (on either sides of a transaction)
- **Managing Conflict of Interest:** TresVista has implemented an organizational structure and several procedures to ensure that conflicts of interest are prevented and there is no or minimal material risk of damage to the interests of the Clients.
- **Disclosure of Conflict of Interest:**
 - In the event of a conflict, it is the responsibility of the VP/EVP of that department/team to disclose them to the Compliance department immediately via an email
 - The Compliance department reserves the right to inform the Client in all conflict situations once they receive this intimation from Interns

Material Non-public information (MNPI)

- The MNPI Policy has been defined to support and comply with Laws governing:
 - Trade in securities while in possession of material Non-public information about any Company or its subsidiaries, and
 - Disclosure of MNPI to outsiders ('Tipping')
- A separate MNPI Policy is maintained, detailing the definitions and treatment of MNPI, which can be referred to in section 4.18 of this Handbook



Outside Business Activity

- Given the possibility of a conflict of interest in the context of the nature of services provided by TresVista to its Clients, all the Interns are required to comply with Laws in this regard and make all relevant disclosures to TresVista to avoid any conflict of interest
- Interns must disclose such conflicts of interests to the Conflict of Interest Committee, per the process defined in section 2.4 of this Handbook

Intern Awareness

At TresVista, training is provided to all new Interns as a part of the induction process.

Compliance

- The Compliance department will carry out internal checks, and verifications as a part of the internal Audit process. It will verify adherence to this policy through various methods, including but not limited to, random checks or any other means as deemed necessary
- Once the Compliance department receives intimation from the department/team about the receipt of information leading to material risk of damage to the Client's interests, necessary steps as defined in this policy are taken

Non-Compliance

Any non-compliance with the policy attracts Disciplinary Action. Serious offenses such as theft of MNPI, illegal disclosure of sensitive data, etc., will be grounds for Termination with Cause and may also involve legal consequences, at the discretion of the Company.

2.6 Personal Relationships

Interns must notify the firm in case they have a personal relationship with another employee, intern, third-party resource, or Partner. Such information is collected by the Company to avoid and handle any probable conflict of interest, complaints of harassment (sexual or otherwise), favoritism, discrimination, etc. resulting out of any personal relationships.

Definition

Personal relationships with another Employee, Intern, Third-Party Resource or Partner include but are not limited to:

- Romantic relationship and/or,
- Family relationships (including but not limited to, parents/in-laws, children/grandchildren, grandparents/in-laws, siblings/in-laws, spouse, biological uncles/aunts, cousins)



Points to Note

- Interns must avoid any circumstances that could be viewed as a conflict of interest or act as a cause of potential sexual harassment
- Interns must immediately notify their respective Reporting Authority and HR Compensation and Benefits 2 team (compensation2@tresvista.com) in case of personal relationship with another Employee, Intern, third-party resource or Partner:
 - Within one's team/department
 - Reporting directly or indirectly to an Intern
 - Belonging to a different team/department
- Upon disclosure, the Company, to the extent possible, takes efforts to accommodate the parties involved via:
 - Reassignments/transfers to different teams/departments
 - Any other actions, as applicable
- Failure to disclose such relationships may result in Disciplinary Action
- Inappropriate public display of affection in the office is strictly prohibited

2.7 Anti-Sexual Harassment Policy

TresVista aims to foster a professional, open and trusting workplace. The purpose of this policy is to safeguard women against sexual harassment at the workplace. Sexual harassment against women in any form is an offence under this policy and is punishable in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 ("Act") and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 ("Rules"), and any other applicable legal provisions.

Definition

Sexual harassment of a woman includes sexually determined behavior that is unwelcome to the woman at whom such behavior is directed (whether directly or by implication). Sexual harassment includes actions such as:

- Physical contact and/or advances
- Making sexually colored remarks
- Showing pornography and/or any pornographic material
- Any other unwelcome physical verbal, or non-verbal conduct of a sexual nature
- Any unwelcome sexual advances, demand for sexual favors, either implicitly or explicitly in return for betterment in working conditions, promotions, assignments, evaluations in connection with any duties at the Company



- Any unwelcome sexual advances, demand for sexual favors, either implicitly or explicitly with the threat that if a woman does not agree it would affect her career and internship prospects with the Company
- Any unwelcome act of a sexual nature or any conduct of a Person in authority or otherwise, which outrages the dignity or modesty of a woman and is likely to affect her health or safety and/or create a hostile and/or intimidating work environment
- Any conduct of unwelcome sexual nature and which has the purpose or effect of unreasonably interfering with a woman's work performance
- Any act, advances, explicit or implied, which is of a sexual overtone which the Aggrieved Woman considers to be an act of outraging her modesty or dignity through a virtual communication is also considered to be an act of sexual harassment

Scope

- This policy is applicable to all Employees/Interns of the Company in India, including those who are citizens of India but may be situated in a different country in the duration of their engagement with the Company
- For the purpose of this policy:
 - “Employees” include everybody on a regular, temporary, full-time, part-time, ad hoc, daily wage basis, and also extends to trainees, Interns, probationers, apprentices, Interns on contract, Persons employed through contractors/agents, consultants or any other service provider and even Persons working on a voluntary basis or without any form of remuneration, irrespective of whether they are working out of Company premises or any other place where they are fulfilling their obligations as per their agreement
 - “Workplace” includes:
 - All offices and premises of the Company where its business is conducted including but not limited to a virtual setup which is available to an Intern at the residential place, or at a place where the Intern is currently residing at the time when such acts of sexual harassment took place
 - Any place visited by an Intern in discharge of the duties towards the Company or where the Intern is present in a work-related context or in a professional capacity, including training programs, conferences, off-site meetings and events, work related functions, office parties, business or field trips organized by the Company
 - Places visited when conducting the business of the Company in interaction with third parties and also transportation provided by the Company for undertaking such a journey
- An Aggrieved Woman has the right to complain against sexual harassment regardless of:
 - Her age or her internship status with the Company
 - The sex of the Alleged Perpetrator
 - Where such harassment occurs



- In case the Alleged Perpetrator is not an Intern of the Company, and Aggrieved Woman is an Intern, the Company takes all steps necessary and reasonable to assist her with additional support and preventive action, including, where requested in writing by the complainant, cause to initiate action against the respondent under the Indian Penal Code, 1860 or, where relevant, cause a representation to be made to the Company of the respondent

Points to Note

- All Interns of TresVista are encouraged to report sexual harassment experienced by them or brought to their knowledge to the Internal Committee (IC)
- Confidentiality of information of a complaint against sexual harassment (including name of the Aggrieved Woman, details of the complaint and all related matters) must be maintained at all times. Violation of this requirement is punishable by Law
- Information without particulars, specifically with regard to the identity of the parties involved, may be used by the Company where required for authorized purposes under the Law
- Reporting authorities are responsible for ensuring awareness of this policy within their teams
- Reporting authorities must report an issue to the IC if an occurrence of sexual harassment is brought to their notice, within forty-eight (48) hours of receipt of such notice
- As a part of the anti-sexual harassment initiative, Interns must undergo trainings and workshops aimed at spreading awareness

Non-Retaliation

- All complaints against sexual harassment must be made in good faith. A good faith complaint means that the Person making the complaint has provided all the information they possess, that they believe their complaint to be true and that they have made the complaint because the acts mentioned in it violate this policy
- The Company takes a Disciplinary Action against any Person responsible for or involved in any attempt of retaliation (that is, negative behavior aimed at a Person because of a Person's association with an inquiry into sexual harassment) against the complainant, a witness or any Person involved in an inquiry into sexual harassment, including termination, and any other applicable appropriate legal action
- Any form of victimization or retaliation must be immediately reported to the IC

Raising A Complaint and Redressal Mechanism

1. Internal Committee

- Case proceedings for complaints against sexual harassment are undertaken by an Internal Committee ("IC") at TresVista
- The IC can be reached at the following email IDs, depending on the Interns' location:



- Mumbai, icmumbai@tresvista.com
 - Pune, icpune@tresvista.com
 - Bengaluru, icbengaluru@tresvista.com
 - Gurugram, icgurugram@tresvista.com
- The names and email addresses of the IC members are listed on the posters at all the office locations

1.1. Constitution of the Internal Committee

- The Internal Committee must have four (4) members, of which two (2) members must be women
- The herein above composition of the Internal Committee is in line with the provisions of section 4 (2) of the Act, which mandates the below:
 - **Presiding Officer:** Woman employed at a senior level at the workplace from amongst the Interns
 - In case a senior level woman Employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace
 - Additionally, in case the other offices or administrative units of the workplace do not have a senior level woman Employee, the Presiding Officer shall be nominated from any other workplace of the same Employer or other department or Organization
 - **Members** – Not less than two (2) members from amongst Interns preferably committed to the cause of women or who have had experience in social work or have legal knowledge
 - **External Member** – From amongst non-governmental Organizations or association committed to the cause of women or Person familiar with issues relating to sexual harassment
 - At least one-half of the members nominated to the Internal Committee must be women
- The Company ensures that the composition of the Internal Committee is in line with the herein above specified provision of the Act, as amended, at all times

1.2. Disqualification, resignation, or termination of membership of Internal Committee

- An Intern/member ceases to hold office as a member of the Internal Committee if she/he ceases to be an Intern of the Company. Further, any member is disqualified by the Company, at its own sole discretion, from acting as a member if she/he:
 - Is found guilty of committing an act of sexual harassment or any other act of moral turpitude;
 - Contravenes section 16 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013;
 - Has been convicted for an offence or if an inquiry into an offence under any extant Law is pending against her/him;
 - Is found guilty in any disciplinary proceedings or if a disciplinary proceeding is pending against her/him;



- Has so abused her/his position as a member of the Internal Committee so as to render her/his continuance in office prejudicial to public interest
- In the event of any disqualification, resignation, or termination of appointment of any member, the Company, with respect to an outgoing Intern, forthwith notifies a substitute Intern and with respect to the external member, makes best efforts to find an external member as quickly as possible
- Notwithstanding the aforesaid, the Company is entitled, at its sole discretion and at any time, to terminate the appointment (as member of the Internal Committee) of any Intern and appoint a substitute thereof

1.3. Recusal by Member

Any Internal Committee member who believes that his/her objectivity may be compromised for any reason may apply to the Internal Committee to recuse him/herself from an investigation. The Internal Committee considers whether to accept such requests and if accepted, appoints a replacement Internal Committee member for an investigation in accordance with the Law and/or this policy and notify all concerned parties

1.4. Functions of the Internal Committee

The Internal Committee has the following responsibilities:

- Implementation of the policy relating to prevention of sexual harassment at the workplace;
- Conducting inquiries in accordance with this policy and applicable Laws in force in India, relating to the prevention of sexual harassment;
- Organizing workshops or interactive programs to spread awareness on the issue of sexual harassment as well as this policy amongst the Interns of Company; and
- Keeping a record of all complaints received and the actions taken by the Internal Committee and Company thereon

1.5. Decisions

The Internal Committee decides through unanimous decisions taken by all the members.

1.6. Redressal Mechanism

- Any Intern/individual who wishes to make a complaint alleging an act of sexual harassment, would have do so to the Internal Committee in the manner described below. The procedure of redressal of such a complaint is also provided below
- The IC has the powers of a Civil Court while conducting an inquiry and acts in accordance with the principles of natural justice and all parties are given the Opportunity to be heard

2. Raising a Complaint

- A written complaint to the IC (email IDs mentioned above) with a detailed record of the incident/s (such as dates, time, locations, description of the incident and any other relevant information) is mandatory for initiation of an inquiry



- No Disciplinary Action is taken against anyone on the basis of a verbal complaint
- A written complaint made through an online mode of communication consisting of all the details pertaining to the act of sexual misconduct, including the description, time, date etc. whether made by an Aggrieved Woman or the below-mentioned people on her behalf is deemed to be a valid complaint. The complaint along with all the relevant communication, evidence, if any, can be uploaded as attachments in the email or through any other mode as communicated by the Company
- If the aggrieved Person is unable to make a complaint on account of their physical or mental incapacity, a complaint may be filed by the below-mentioned people:
 - Physical Incapacity (With the written consent of the aggrieved Person):
 - Relative or friend
 - Co-worker
 - An officer of National Commission for Women or State Women's Commission
 - Any Person who has the knowledge of the incident
 - Mental Incapacity:
 - Relative or friend
 - Special educator
 - Qualified psychiatrist or psychologist
 - Guardian or authority under whose care they are receiving treatment or care
 - Any Person who has the knowledge of the incident jointly with the above-mentioned people
- The Aggrieved Woman or her legal heir making such a complaint on her behalf should ensure that all the IC members are marked as the recipients of the complaint
- A complaint can also be made by a legal heir on behalf of an Aggrieved Woman on account of her physical or mental incapacity or death or otherwise
- If an Aggrieved Woman feels that she needs support in making the complaint in writing, she may contact the IC for assistance
- An Aggrieved Woman may file a complaint within three (3) months from the date of the incident, and in case of a series of incidents, within three (3) months from the date of the last such incident. The IC, on its discretion can extend this time limit not exceeding three (3) months, the reasons to be recorded in writing, if it is satisfied that the circumstances were such that prevented the Aggrieved Woman from filing a complaint within the said period
- Interns must promptly inform the IC of incidences of sexual harassment, especially in cases where such incidences involve a threat to the security of a Person or the Company
- If the complaint is against a member of the IC, Interns must inform any other member of the IC



- The Company provides the Aggrieved Woman support to file a complaint with the police if she so desires
- Upon receipt of a complaint, whether in writing or otherwise, the IC is expected to respond to the Aggrieved Woman within five (5) working days as a best practice
- Within seven (7) working days of receipt of the written complaint, the IC informs the respondent in writing that a complaint has been filed against him or her and provide a copy of the complaint to enable the respondent to furnish a response
- The respondent is given ten (10) working days to furnish a reply in connection with the allegations of sexual harassment

Malicious or false complaints and false evidence

- A false complaint is a complaint that is known to be false by the Person making the complaint at the time the complaint is made
- A Person making a false complaint or providing false evidence in an inquiry into sexual harassment is subjected to Disciplinary Action, based on the recommendation of the IC
- A mere inability to substantiate a complaint, or provide adequate proof, does not lead to the complaint being considered as a false or malicious complaint

3. Conciliation

- In case the complainant wishes to settle the matter with the respondent without an inquiry, the IC may facilitate a conciliation between them
- No monetary settlement is made the basis for arriving at any settlement through such conciliation
- Any settlement that is arrived at between the parties during conciliation is recorded in writing and the IC provides copies of the settlement as recorded, to both the parties
- If a settlement is arrived at through conciliation, no further inquiry is required to be conducted by the IC and the matter is treated as closed
- The IC proceeds to make an inquiry into the complaint in cases where:
 - No conciliation has been requested by the complainant, or
 - No settlement has been arrived at between the parties and/or
- If the complainant informs the IC that any term or condition of the settlement arrived at earlier has been breached by the respondent

4. Inquiry

4.1. Process

- The IC follows the inquiry process as laid out in the Company's investigation Handbook. A copy of the investigation Handbook can be accessed on the common SharePoint link



- The IC hears both, the complainant as well as the respondent to record their statements
- Both parties may submit to the IC evidence and a list of witnesses to support their statements
- The IC may summon the attendance of any Person and examine the Person on oath as well direct production of any document which may assist the IC in an inquiry into sexual harassment
- If either party remains absent during the inquiry proceedings for three (3) consecutive hearings, the same may be conducted ex-parte on the basis of material on record
- The IC must conclude the inquiry proceedings within a period of ninety (90) days from the date of the receipt of the written complaint
- The inquiry in the matter can be conducted through a virtual online session if any of the parties involved is working from home. The IC may conduct the inquiry on video calls and may also record it for audit purposes and references

4.2. Interim Actions

During the pendency of an inquiry:

- The IC may, based on the request of the complainant, recommend to the Company to transfer the complainant or the respondent to any other workplace or grant the complainant leave up to a period of three (3) months, in addition to any other paid leave she may be entitled to, under her terms of internship. Neither the complainant nor the respondent has any choice of place of transfer as it is as per the Company's requirements
- If the IC is of the view that the presence of the respondent at the workplace is detrimental to the interest or to the conduct of a free and fair inquiry, it can recommend to the Company to place the respondent under suspension or leave pending completion of the inquiry:
 - Full stipend is payable during such period of suspension pending inquiry
 - Such suspension order may also include an order prohibiting the respondent from accessing the Company's IT facilities, Interns or third parties to enable a fair and objective inquiry
 - Supervised access is provided to information relevant to the respondent to prepare a defence in the inquiry and the **Alleged Perpetrator** may make any such requests in writing to the IC
- In case the IC determines it to be necessary, it may recommend counselling for the complainant to the Company, which is offered to her at the cost of the Company

4.3. Post Inquiry

- On completion of the inquiry, the IC submits the report of its findings to the Management of the Company along with all relevant documents, within ten (10) days from the date of closure of the inquiry proceedings, a copy of which is also made available to the complainant and the respondent
- If the allegations against the respondent have not been proved, the Company takes no action in the matter



- If the allegations have been proved, the Company takes appropriate action against the respondent within sixty (60) days of receipt the final report
- Proceedings conducted under the provisions of this policy, are considered to be disciplinary proceedings under the Company policy and no separate inquiries are required to be conducted

5. Disciplinary Action

As prescribed by the IC, Disciplinary Action may include the following:

- Rendering of a written apology
- Censure and reprimand
- Payment of a fine
- Demotion or withholding of promotion
- Termination with Cause in keeping with section 7.2 of this Handbook
- Attending counselling
- Undertaking community service
- Monetary compensation to be paid to the complainant. The sum to be deducted is decided on the keeping in mind:
 - The mental trauma, pain and suffering of the complainant
 - The loss in career Opportunity of the parties
 - The medical expenses incurred due to sexual harassment, whether for physical or psychiatric treatment and the income and financial status of the respondent
- The amount may be deducted from the stipend of the respondent or he/she may be instructed to make the payment directly to the complainant

Repercussions of sexual harassment may also result in initiating criminal charges, in addition to any action the Company may take, based on the recommendations of the IC. These actions are in addition to any legal recourse, and where any conduct or actions amount to specific offences under the Law.

2.8 Code of Ethics

The purpose of this policy is to define a set of principles for Interns to ensure that their actions are in accordance with the ethical standards and primary values of the Company.

Overview

The Code of Ethics provides further clarity on TresVista's mission, values, and principles, linking them with professional conduct standards. It also articulates values that TresVista wishes to foster in Interns and, in doing so, defines desired behavior. Interns should adhere to the core ethical principles for guidance in decision-making and business conduct.



Thus, the code of ethics becomes a benchmark against which individual and organizational performance can be measured. It establishes a direction and pathway to meet the Organization's ethical responsibilities towards its stakeholders.

Competence

Interns must develop and maintain relevant knowledge, skills, and behavior to ensure that any activity is conducted professionally and proficiently. This includes but is not limited to acting with diligence, as well as obtaining, and regularly updating the appropriate qualifications, training, expertise, and practical experience. All Interns must understand and comply with any applicable Laws, rules, regulations, and internal policies.

Integrity

During and after the term of their internship with TresVista, Interns must:

- Behave in an accountable and trustworthy manner
- Avoid any acts that might damage the reputation of the Company or bring discredit to the Organization at any time
- Personally escalate noncompliance issues appropriately
- Understand the importance of internal controls and consistently comply with them
- Not solicit or accept anything of value from anyone (directly or through others such as family members) if it is intended or could reasonably appear as intended to improperly influence the decisions to be taken on behalf of TresVista
- Neither indulge in the trade of the Company's stock for which they have access to confidential material and/or Non-public information about a supplier, customer, or competitor nor should they advise others including connections to do so (definition of connections can be referred to in the Personal Account Dealing Policy)
- Act based on ethical behavior with an aim to build relationships on honesty and transparency
- Not engage in practices that distort prices or artificially inflate trading volume with the intent to mislead market participants

Morality

If an Intern commits any act, which:

- Is an offence involving moral turpitude under central, state or local Laws
- Might tend to bring the Intern to public disrepute, contempt, scandal or ridicule
- May embarrass, offend, insult or denigrate individuals or groups
- May shock, insult or offend the community or the Company's workforce or public morals or decency or prejudice the Company
- Results in actual or threatened claims against the Company



TresVista has the right to look into such matters and take necessary actions in its sole discretion as it deems appropriate. These actions might include but are not limited to the immediate right to unilaterally terminate the internship for cause; in such cases no prior notice of termination is provided.

Fair Dealing, Diversity and Equal Opportunity

- TresVista condemns discrimination in any form and aims to provide a healthy and dignified work environment for all Interns
- Interns must treat all fellow Interns, Interns and third parties with respect and merit irrespective of their sex, age, sexual orientation, marital status, caste, religion, color, race, nationality, or any disability they may have. Harassment and bullying are considered as gross misconduct and are prohibited
- Interns must create a culture of fairness and transparency, which includes treating those with whom we have professional relationships with respect and ensuring that Interns consider the impact of their decisions and actions towards all stakeholders
- TresVista does not hire or terminate, reward or punish, or award or deny contracts based on personal considerations, including but not limited to favoritism, nepotism, or bribery

Confidentiality

During and after the term of their internship, Interns must:

- Hold in the strictest confidence and not use, divulge or disclose, disseminate, publish, lecture upon, sell or transfer any Confidential Information to any Person except as required by their internship and for the benefit of the Company
- Not permit any Person to examine and/or make copies of, any documents, writings, drawings, materials or records, that contain or are derived from any Confidential Information received during the term of internship without the Company's prior written permission
 - Such Confidential Information is solely and absolutely vested in and owned by the Company, and the Interns does not have or claim any right, title or interest therein
- Not divulge or disclose to any other Intern or Interns, the stipend receivable from the Company
- Comply with, and do all things necessary to permit the Company to comply with all Laws, and with the provisions of contracts executed by the Company relating to Intellectual Property or to the safeguarding of information, including the signing of any confidentiality agreements required in connection with the performance of their duties and functions



- Hold and use the Confidential Information which may be in the nature of unpublished price sensitive information as defined in the SEBI's (Insider Trading) Regulations, 1992 (as may be modified/amended/re-enacted from time to time), in the manner and in terms of those regulations
 - Not pass along sensitive information or tip anyone to buy or sell securities whilst in possession of such information of such securities
- Upon termination of Interns for whatever reason, deliver to the Company all working papers and/or other material and copies provided to the Interns pursuant to their internship or prepared by the Interns during the term of their engagement, without retaining any copies
- Follow the highest standards of information security to keep any Client information confidential in order to protect the confidentiality and sensitivity of the information provided by them
- Ascertain that any data shared by the Clients is used for intended purposes only and any sensitive information is not divulged to anyone, including third parties, without the explicit consent of those involved – unless disclosure is required by Law or regulation
- Believe that all information about the Company and its business (including the past, present and Prospective Clients, business Partners, vendors, directors, Interns and Interns) is confidential unless otherwise stated
- Not share user IDs, passwords, access details, software, or authentication devices that are intended for individual use to gain access to a system
- Respect the Company's security controls and access information only within their authorized access level
- Not discuss the Clients in public to prevent unauthorized people (outside the team) from gaining access to this information
- Not share any data or information within or outside TresVista unless express consent is received from the respective reporting authority or other authorized Intern
- Confirm that all the files are precisely stored, deleted or destroyed as directed by the reporting authority or other authorized Intern and as mandated by the contract
- Not cause any unauthorized disclosure of any material, through any failure to exercise due care and diligence
- Not reproduce, store in a retrieval system or transmit in any form or by any means, electronic, mechanical, photocopying, recording, scanning or otherwise, any Copyrighted material which is the property of the Company, for their own benefit or for the benefit of any Third Party, that contain or are derived from any Confidential Information received during the term of their internship
- Not at any time during the continuance of their internship or on expiry or termination or cessation of internship with the Company, issue any unauthorized statements to the press or any Third Party regarding the Company, the Company's business, this Agreement and their internship with the Company



- Not have or claim any right, title or interest therein since Confidential Information shall be deemed as the Company's trade secrets and solely and absolutely vested in and owned by the Company

Obligations under this section continue after the termination of internship, without any restrictions regarding time (i.e., indefinitely) and are binding upon the Intern's heirs, assigns, executors, administrators and other legal representatives. Intern's obligations under any such additional confidentiality agreements shall supplement and not override the other provisions of this policy unless otherwise expressly stated otherwise:

- To information which is or comes in the public domain other than through the Intern's unauthorized disclosure
- To the extent that such information is required to be disclosed by any Law or any applicable regulatory requirements or by any regulatory body to whose jurisdiction the Company is Subject or with whose instructions it is customary to comply under notice to the Company
- In such cases, the Interns must immediately notify the Company and cooperate as reasonably requested by the Company in its attempt to prevent or limit such disclosure
- To prevent the Interns from using their own personal skill in any business in which they may lawfully be engaged after the termination of their internship, provided such engagement is in compliance with exit formalities provided in the Handbook (Refer to section 7.4 of this Handbook)

Communication

During and after the term of their internship, Interns must:

- Use electronic technology maintained by the TresVista responsibly and professionally
- Foster open lines of communication amongst team members
- Ensure Client communication is complete, accurate, professional, and consistent with the Intern's stated duties to Clients. For purpose of this provision, Client for Interns shall refer to all stakeholders working with the Interns and reviewing the deliverables submitted by them
 - It is essential to proofread all emails prior to sending and use a business email address with proper signature (Refer to section 3.16 of this Handbook)
- Avoid phrasal verbs, contractions, colloquial, and textspeak in any written communication, whether internal or external
- Disclose to Clients the basic format and general principles of the processes used at TresVista and promptly communicate any changes that might materially affect those processes. It is essential that Interns use reasonable judgment in identifying factors that are essential to servicing Clients and include these factors in communication to Clients
- Refrain from exaggerating or using inaccurate statements that could be easily misunderstood or used against TresVista in legal proceedings



Commitment to Quality

- TresVista aims and ensures to deliver unmatched quality to its Clients by helping every Intern and Intern embrace the ethos of utmost diligence and establish multiple levels of quality checks and instant investigation and correction of any deviations
- TresVista only recommends services/solutions that it believes is a proper fit for each Client's needs
- Interns must make reasonable inquiries into a Client's requirements, industry practices, business requirements, and constraints, if any, and strive to reassess and update this information regularly
- Interns must ensure that any completed Product is suitable and consistent to the Client's written objectives, and mandates, specified orally, via emails or in line with the terms of the signed agreement
- It is imperative for Interns, to be honest and upfront in advertising and marketing claims to avoid misrepresentation, exaggeration, ambiguity and reduce complexity & excel at execution

Ownership

During and after the term of their internship, Interns must:

- Act with reasonable care and exercise prudent judgment
- Accept responsibility for any decisions or actions that may impact the Company's interests or stakeholders
- Act for the benefit of Clients and place the Client's interests before the Company's or the Intern's personal interests
- Ascertain accuracy and completeness in the delivery of the Company's services
- Display consistency between speech and actions
- Commit to have zero tolerance for both internal and external Fraud
- Report potential or suspected violations of the Law or TresVista policies including, situations when they know or suspect that other Employees or Interns are currently or potentially engaging in illegal, or unethical activities

Partnership

During and after the term of their internship, Interns must:

- Work with others to develop solutions and break down internal barriers
- Assume positive intent in working with others, value and encourage diversity
- Share ideas and Resources across the Organization for scale and impact
- Manage Resources rather than owning them
- Build effective relationships with colleagues and industry Partners to enable others to be successful
- Discuss the importance of ethics and compliance regularly with all team members
- Deliver and seek timely and actionable feedback



- Foster fair competition between any potential suppliers and encourage suppliers to comply with the sound business practices TresVista embraces, follow the Law, and conduct activities in a manner that respects human rights
- Build a positive working environment, along with the responsibility to speak out and ask for a change if any conduct that runs contrary to this principle is observed

Health and Safety at the Workplace

Interns must be cautious and do nothing that might endanger or harm TresVista's business associates in any way – whether they are fellow Interns, vendors, Interns, etc. Interns are expected to keep the workplaces safe by following the health and safety norms, ensuring a safe, dignified, and productive work environment.

Objectivity and Independence

Interns should work at TresVista in a professional manner with objectivity, independence of mind and appearance. Interns must impose an obligation on their fellow Employees or Interns to not compromise their professional or business judgment because of bias, conflict of interest, or any undue influence of others.

Fairness, Care, and Respect Towards Interns

Interns must treat fellow Interns and Interns & third parties in TresVista, with fairness, care, and respect and make all decisions in complete fairness and free from competing self-interest and prejudice.

Human Relationships

Interns must ensure that relationships with fellow Interns, Interns and Third parties are based on trust, integrity, and respect. They must avoid aggression (physical or verbal) or any related act against personal dignity.

Good Environment Practices

- TresVista pledges to minimize wastage of energy, water, and other Resources, prevent discharge that would harm the environment, and recycle wherever possible
- TresVista strives to ensure and demonstrate continuous improvement in preserving the environment
- Interns must ensure to switch-off lights, computers, printers, and other electronic devices when not in use and/or at the end of the workday and avoid unnecessary printing of documents
- Interns must make a judicious use of air-conditioning and heating devices and switch-off devices when not in use

Additional Compensation Arrangements

- Interns should not accept gifts, benefits, compensation, or consideration in any form from the Clients, vendors, consultant, service provider, and any outside agency or other parties who have a business relationship with TresVista without following the approval matrix prescribed in the Gifts Policy



- Interns should not accept any remuneration, stipend, fee, perquisites, or other compensation in any form from any Person, or entity for working as part-time, assignment, contractual basis or otherwise

Loyalty, Prudence, and Care

- Interns must not use Resources, including time, material, equipment, and information provided by TresVista for personal use or to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate
- Interns must not use any equipment of TresVista such as computers, copiers, and fax machines in the conduct of an outside business or support of any religious, political, or other daily activity, except for Company-requested support to non-profit Organizations
- Interns who represent TresVista must behave responsibly and use good judgment to conserve Resources

Upholding the Code

- The Board of Directors (Board) and Management of the Company are committed to the maintenance of high standards of ethics, honesty, and integrity, and promoting a corporate culture that adheres to these values
- TresVista does not accept any justification or excuse for breaking the code, whatever the reason – whether for profit, convenience, competitive advantage, or request/demand from any third-party or individual

Fraud, Whistleblower and Raising Concerns

- TresVista through its work ethics is committed to the highest standards of moral and ethical behaviour and has a zero tolerance for both internal and external Fraud
- Each Intern at TresVista is its ambassador and expected to uphold the principles of honesty and integrity, on which TresVista is built. With a view to ensure ethical behaviour; TresVista considers it appropriate to provide a channel to its Interns, Interns and stakeholders to speak up when they see behavior inconsistent with its values and bring to the notice of the Compliance department any event of concern that may warrant necessary Disciplinary Action (E.g., an Intern raising a concern regarding the dishonesty of a superior/an Intern from the top Management)
- Through this clause, TresVista is committed to support and enforce the Fraud and Whistleblower Policy (mentioned in section 2.11 of this Handbook), which aids in the detection and prevention of Fraud. This clause also ensures honest, open and well-intentioned working environment where people are confident to raise their concerns without fear of reprisal, retaliation, discrimination or any kind of harassment
- Any concerns involving unethical behavior should be reported via email to the Ethics Committee at coe@tresvista.com



Ethics Committee

- The Ethics Committee has been designated to deal with grievances, and unethical issues arising in the Organization and Intern's, Intern's acts within and outside their internship at TresVista, which might damage the Company's reputation or adversely impact Client and vendor relations
- The Committee offers assistance in addressing and giving solutions to the issues mentioned above with the intention of establishing fairness in the Organization

1. Definition

Cases under the purview of the Ethics Committee include, but are not limited to:

- Violation of the code of ethics or code of conduct
- Unauthorized consumption of alcohol in the office premises
- Misuse of the Company's Resources
- Theft/embezzlement in and/or around the office premises
- Misappropriation or misrepresentation of Company funds
- Misconduct by another Intern or Intern
 - Engaging in physical or verbal abuse with other Employees or Interns
 - Bullying or playing pranks on another Employee or Intern
- Discrimination based on caste, religion, gender
- Damage caused to TresVista's property
- Undue influence/nepotism
- Cheating/malpractices while completing training assignments
- Issues with reporting authority /superior
 - Inappropriate or unethical conduct
- Violation of Company policies and procedures
- Working conditions
 - Concerns regarding infrastructure
 - Workplace hygiene
 - Workplace decorum
- Any act which might bring the Intern to public ignominy, offends other Employees or Interns, public ethics or pose a risk to the Company's reputation

2. Scope

- This clause applies to all Interns of TresVista
- For this clause:



- “Complainee” refers to an Intern or Interns who is complained about, a Subject of the complaint
- “Complainant” refers to a Person who files a complaint

3. Points to Note

- All Interns of TresVista must report any grievances, unethical issue/s, violation of code of ethics or code of conduct experienced by them, or brought to their knowledge or witnessed any act that might damage the Company’s reputation to the Ethics Committee
 - Confidentiality of information of a complaint against unethical issues/grievances or any inappropriate act of Intern or Intern (including name of the complainee, details of the complaint and all related matters) must be maintained at all times

4. Committee Formation

- Inquiry into complaints against unethical issues and grievances is undertaken by an Ethics Committee (“EC”) at TresVista
- The Committee comprises of senior members of the Firm who review all reported cases
 - EC should be reconstituted per the tenure defined by the Organization

5. Stages of Redressal Mechanism

- Interns should follow standard guidelines before lodging a complaint. At times complaints can be a way of negative feedback, which may not require a resolution or formal follow-up
 - The complainant may choose to express their concern to the respective reporting authority/head of their department or write to the EC directly

6. Complaint Making

- A written complaint to the EC with a detailed record of the incident(s) (such as date, time, locations, details of the incident, etc.) is mandatory for initiating an inquiry into the matter
- The complaint can be raised by sending an email to coe@tresvista.com
 - The EC does not investigate against anyone based on verbal complaints

7. Malicious or False Complaints and False Evidence

- A Person making a false complaint or providing false evidence in an inquiry is Subject to Disciplinary Action
 - A mere inability to substantiate a complaint, or provide adequate proof, does not lead to the complaint being considered as false or malicious

8. Inquiry Process

- The EC follows the inquiry process as laid out in the guiding principles of the Ethics Committee
- The EC hears both, alleged complainee and complainant to record their statements
- Both parties may submit evidence and a list of witnesses supporting their statements, to the EC



- Upon receiving any concerns regarding unethical issues/grievances, the EC convenes a meeting to deal with the complaint and makes a preliminary inquiry to verify the facts for the complaint within a time frame of two (2) to five (5) working days from the time of the receipt of the written complaint

9. Post Inquiry

- If the allegations against the complainees have not been proved, the EC does not take any action in the matter
- If the allegations have been proved, the EC takes appropriate action against the complainees based on the Disciplinary Actions under this clause, and the decision of the Committee is binding and final

10. Reports and Documents

- Investigation results are not disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputation of the complainees subsequently found innocent of wrongful conduct and to protect the Company from potential civil liability
- All disclosures made by the Ethics Committee, reports and documents obtained during the course of any investigation, along with the results of the investigation relating to it, are retained by TresVista for a minimum period of four (4) years
- EC submits a summary of the reported concerns, if any, on a quarterly basis to the HR Compensation and Benefits 2 team (compensation2@tresvista.com) and the Management, highlighting the following:
 - Nature of reported cases and the proposed action
 - Status of cases reported in the current/prior period and the action taken
 - Results/status of any investigations/enquiries with reference to the cases reported

Disciplinary Procedures

- In case of any violations (whether it is the Code of Ethics, Code of Conduct, TresVista policies, or outside Laws, rules, and regulations), TresVista does not hesitate to report it to the relevant authorities
- The Interns, their reporting authority and any other Person who was conscious of the breach and did not report it is Subject to the following Disciplinary Actions, including but not limited to:
 - Reconciliation/resolution of the issue through conversation
 - Rendering a written apology
 - Warning letter
 - Withholding promotion
 - Reduction of performance rating
 - Monetary compensation to be paid to the Company
 - Termination with Cause in keeping with section 7.2 of this Handbook



Legal Notice

This Code serves as a reference to its Interns. TresVista reserves the right to modify, suspend or revoke this Code and any policies, procedures, and programs in whole or in part, at any time, with or without notice. TresVista also reserves the right to interpret this Code and these policies in its sole discretion as it deems appropriate.

Neither this Code nor any statements made by any Intern of TresVista, whether oral or written, confer any rights, privileges or benefits on any Interns, create an entitlement to continued internship at TresVista, establish conditions of internship, or create an express or implied internship contract of any kind between Interns and TresVista. Interns should also understand that this Code does not modify their internship relationship, whether at will or governed by a written contract.

2.9 Code of Conduct

The purpose of this policy is to define standards and set guidelines concerning acceptable behaviour from Intern. The code of conduct is a commitment to conduct business ethically and helps the Company lay the foundation for core Company values and maintain high standards of behaviour and performance. By committing to the code of conduct, Intern are expected to support the Mission, Vision, and PACT of TresVista.

Overview

All Interns must conduct their personal affairs and manage their business transactions in a manner that does not result in adverse comments or criticism from the public, or in any way damage the Company's reputation as a responsible financial services Organization. This policy addresses both business and social relationships, which may present legal and ethical concerns, and sets forth a code of conduct to guide Interns and provides an understanding of consequences and Disciplinary Actions if the conduct is violated/not adhered to. Sections of this policy have reference matters for which specific policies also exist, this is because the code of conduct encompasses standards of behavior outlined in other TresVista policies.

Eligibility

This policy applies to all Interns of TresVista. Each Intern is expected to become familiar with TresVista policies that directly or indirectly impact their day-to-day operations/responsibilities and are required to affirm to have read and understood the code of conduct at the time of joining.

Particulars

- TresVista expects its Interns to fully comply with the spirit and intent of all applicable Laws, rules, and regulations in accomplishing their assigned duties while using good judgment and ethical standards



- Compliance to the code of conduct is mandatory and all Interns are expected to comply with the policy when performing their duties
- Interns are expected to understand their obligations as per the guidelines defined in this policy
- Interns must promptly report any known or suspected violations of the Company's code of business conduct and ethics
- Adherence to the code is monitored through audit, examination, and human resource procedures

Fair Outcome and Conduct towards the Clients

- Serving Clients is the focal point of TresVista's business and they deserve the highest quality service and standards in all transactions
- Interns must build and foster long-term relationships. This helps serve the Clients better and improves and upholds the Company's reputation
- Interns should provide Clients with valued services and deal with them fairly
- Interns must act with integrity and do everything possible to provide excellent service to them either directly or by supporting the work of other individuals
- Interns must not make any promises that cannot be fulfilled by them or the Organization
- Interns must ensure that TresVista's services are:
 - Well-designed
 - Efficient
 - Transparent and based on useful advice
 - Performed as expected

Payment to Clients and Vendors

- Payments of any nature, which would violate any Law, are not allowed by the Organization
- All payments of fees must be per sound business practices
 - Payments, gifts, or favours must not be made to any Person with the intent to induce them to violate their duties or to obtain favourable treatment for the Intern or Intern or TresVista

Disclosure to the Media

- Social Media and Social Media (Corporate Accounts) policies are supplementary and should be read in conjunction with this policy. The purpose of these social media policies is to ensure that Interns understand and comply with TresVista's disclosure requirements in terms of media interaction and public presentations. The detailed social media policy can be referred to under sections 4.8 and 4.19 of this Handbook



- If Interns are delegated to speak on behalf of TresVista, they will be briefed before being interviewed, to review what is public and private information
- Also, if asked for opinions from the media regarding any of their outside interests, Interns should know that their comments are strictly personal. They should be cautious not to compromise on the Mission and Vision of TresVista

Conduct when representing TresVista

- Interns must conduct themselves professionally and with personal integrity, both in and out of the workplace, reflective of TresVista values
- Interns must communicate and negotiate honestly with all Clients, Partners, stakeholders, suppliers, associates, and other members of the public
- Obligation to act with integrity and within the spirit of this code of conduct continues while traveling, whether domestically or internationally
- It is imperative to avoid having alcoholic drinks while representing TresVista at social gatherings and parties
- Interns are expected to carry an official identity card, and any other document like business card, etc. as may be required to represent TresVista

Involvement in Out-of-Office Activities

- This clause helps Interns understand and comply with TresVista's code of conduct
- They must refrain from directly or indirectly expressing or using the Company's name while involving themselves or participating in or providing their views and opinions on sensitive matters, including but not limited to political, social, or any other comments on any platforms

Conduct in the Company

- Interns are expected to maintain high standards of professionalism as set by TresVista. TresVista aims at enhancing its reputation as a quality service provider and an enjoyable, stimulating, and challenging place to work
- It expects its Interns to achieve and maintain high standards of ethics, professional conduct, and work performance to ensure that TresVista maintains its reputation with all internal and external stakeholders
- High ethical standards must be recognized and valued. Any unethical or illegal behavior must be reported to the Ethics Committee (coe@tresvista.com)
- An environment of honesty, trust and integrity must be maintained
- TresVista's property must be maintained and not be damaged intentionally
- In all dealings with third parties, the policies and directions of the Company must be complied with
- Any behavior or collective action which harms or could harm the integrity and/or interests of TresVista must be avoided



- Use of any Resources in connection with any illegal activity is strictly prohibited, and TresVista cooperates with any legitimate Law enforcement investigation of potential criminal activity

Absenteeism and Tardiness

Interns must adhere to the work hours defined for them. They are expected to be punctual when reporting to work.

Equal Opportunity

- TresVista ensures to provide equal opportunities to individuals without distinction or discrimination because of age, color, national origin, race, religion, caste, sex, physical or mental disability, or veteran status
- This clause applies to all Interns, prospective candidates and all aspects of the internship relationship, including recruitment, compensation, training, transfer, and any other terms and conditions of engagement

Professionalism

Interns must show integrity and professionalism in the workplace.

Personal Appearance

Interns must follow the dress code and personal appearance guidelines as mentioned in the section 3.3 of this Handbook.

Respect in the Workplace

- Interns should respect their colleagues and should maintain a safe and inclusive work environment free from discrimination, bullying, harassment, or exploitation of any form
- Interns must be open to communicate with their colleagues, seniors, or team members
- Interns should treat colleagues fairly and work together to deliver the brand promise
- Interns should be friendly and collaborative and should not disrupt the workplace or pose any obstacles to their colleagues' work
- Interns are expected not to use foul language while communicating within the office premises and during official duties outside the office premises

Communication with Former and Potential Employees or Interns

Interns should be careful in speaking with former and/or potential Employees or Interns and not disclose Confidential Information about the Company, even if it is something that they may already know.

Legal and Social Responsibility

Interns must ensure that their actions comply with and are within the meaning and intent of all applicable Laws and regulations. Interns' actions should be free from suspicion and criticism and have no adverse impact on society.



Sustainability and Environmental Protection

- TresVista continuously educates its Interns on environmental issues and stimulates individual and local initiatives
- TresVista strives to continually reduce environmental impact and endeavors to reduce energy consumption and waste etc.
- TresVista encourages Interns to use eco-friendly means of transport, and set environmental requirements when purchasing goods and services

Protection of Company Property

- Interns should treat TresVista's property, tangible or intangible, with respect and care
- Interns should not misuse TresVista's equipment or use it frivolously
- Interns should respect all kinds of intangible property, such as trademarks, Copyrights, etc. and should use them only to complete their work responsibilities
- When exiting or retiring from TresVista, Interns must ensure that they return all Company property in their possession, including but not limited to records and equipment

Protection of Confidential Information

- Interns of TresVista should protect Confidential Information about the Company, Clients, etc. received during the term of their engagement
- For ensuring that Confidential Information is well protected, Interns should disclose information only on a "need-to-know" basis
 - Details can be referred to in section 4.9 of this Handbook

Prohibition of Insider Trading

- TresVista restricts its Interns from trading in Personal Accounts using price-sensitive information of Clients received during the term of their engagement for personal gain/benefit
 - Details can be referred to in section 4.15 of this Handbook

Frauds and Thefts

TresVista ensures that incidents of Fraud and theft relating to the Company are promptly investigated, reported, and, where appropriate, prosecuted.

Anti-Bribery

- This clause helps Interns understand and adhere to the Company's ethical standards and comply with legal obligations



- It restricts Interns from directly or indirectly, offering, giving, requesting, or accepting any bribe from any Clients, business associate, vendors, competitors, government officials or any other parties, thus observing and upholding TresVista's position on bribery and corruption
- Interns must ensure that they demonstrate high levels of integrity, act ethically, honestly, transparently and in a trustworthy manner in all their deals to protect the Company's and their own interests

Internet Usage: Cybersecurity, Social Media, and Corporate Email

- Interns must refrain from sharing information that is private or proprietary to TresVista
- Interns must avoid posting derogatory comments about Clients, competitors, Company, or their practices on social media
 - For more information, kindly refer to the sections 4.8 and 4.19 of this Handbook
- Interns must align themselves with the Company's Social Media and Social Media (Corporate Accounts) policies and plan before posting anything on social media platforms

Drugs, Alcohol and Smoking

- Interns must not distribute, possess or use illegal or unauthorized drugs or alcohol on the Company's property, time, in connection with the business or in a manner that might affect the performance of their responsibilities and duties to the Company
- No Intern is permitted to smoke at the workplace
- Interns whose behavior, judgment, or performance is impaired by drugs or alcohol should not report to work. Such Interns are prohibited from entering the Company's premises or engaging in Company business
- Violation of this clause is serious and results in the appropriate Disciplinary Actions, including Termination with Cause

Workplace Violence

- Interns should have a safe place to work. Workplace violence, including threats, threatening behavior, harassment, intimidation, assaults, and similar conduct, is not tolerated
- Any threats or concerns about Interns safety or the safety of others must be immediately reported to the respective reporting authorities

Violation

In case of any violations (whether it is the code of ethics, code of conduct, TresVista policies or outside Laws, rules, and regulations), TresVista does not hesitate to report to the relevant authorities. Additionally, the Interns, the reporting



authority or any other Person who was conscious of the breach is Subject to the Disciplinary Action including but not limited to Termination with Cause.

2.10 Acceptable Usage Policy

The purpose of this policy is for the Firm to provide Interns access to email facility and intranet, in order to boost Intern efficiency and streamline interaction with colleagues, customers, and business Partners. This policy defines and educates Interns about the boundaries of responsible behavior, the scope of acceptable use detailing the protection of user's rights, and the consequences of violating those boundaries. This policy is designed to protect TresVista against issues like unauthorized use of facilities which can lead to serious consequences in the form of wasted Resources, reduced Interns morale, risks arising from diminished corporate reputation, and compliance issues, etc.

Applicability

This policy applies to all users including Interns including having access to Information and IT Resources in TresVista.

Particulars

- Interns must agree to the terms and conditions set forth in this policy
- The activities mentioned in this policy are prohibited
- Interns may be exempted from these restrictions during the course of their legitimate job responsibilities (e.g., systems administration staff may have a need to disable the network access of a host if that host is disrupting production services)
- Under no circumstances, an Intern of TresVista is authorized to engage in any activity that is illegal under local, state, national, and/or international Law while utilizing TresVista owned Resources
- The activities mentioned below are by no means exhaustive, but attempt is to provide a framework for activities which fall into the category of unacceptable use

Information Disclosure and Handling of Data

Interns must:

- Be accountable and responsible for judicious and ethical use of the TresVista information and IT Resources
- Ensure that their actions do not compromise the security of TresVista information assets and Resources and comply with the IT Security Policy and other related policies of the Organization
- Access only those Resources, for which they are authorized and use information and IT Resources only for business purposes
- Treat all TresVista data as a valuable asset and protect it accordingly
- Comply with non-disclosure and confidentiality agreements that TresVista has entered into



- Inform the Compliance department and their reporting authority immediately, in case they accidentally come across unsecured sensitive information that could affect the Client and their interest
- Follow the data classification policy and manage data accordingly
- Not discuss and/or transfer any TresVista related information with anyone who is not authorized to have access to it
- Not access any information not related to their work
- Not copy, collect, or propagate any TresVista data or documents outside the network

Work Area Security

- All Interns must comply and cooperate with spot checks and audits
- It is their responsibility to immediately inform their reporting authority and raise an incident with the Compliance department in case they come across any unauthorized Person
- Interns must not access areas that are designated as restricted, unless they are authorized to do so

System Security

The following points are applicable to all except FMS Support Staff:

- The desktop ownership lies with the IT department and data ownership rests with the respective Interns or Intern
- Interns must not intentionally write, generate, compile, copy, collect, propagate, execute, or attempt to introduce any computer code designed to self-replicate, damage, or otherwise hinder the performance of or access to any TresVista IT assets
- Interns must secure data on their systems by using passwords (power-on password, screensaver password etc.) and ensure compliance with the password policy
- Interns must not reveal account passwords to others or allow others to use their account (including family and other household members when working from home)
- Interns must not leave any Confidential Information on their system unattended
- Interns must not keep liquids or magnets on or near computer equipment
- Interns are not permitted to remove or transport computers from TresVista premises without the appropriate permissions
- Interns must not transport removable media's back and forth between home and office

Software Security

The following points are applicable to all except Third Party Interns. Interns must not:

- Download shareware or freeware from the internet, unless or otherwise authorized to do so
- Use TresVista software for personal use
- Install personal software on Company devices



- Copy, collect, propagate TresVista software onto an external network
- Distribute software or fonts to Clients, customers, vendors, and other Persons who are not Employees or Interns of TresVista

General Security Guidelines

The following activities are strictly prohibited, with no exceptions:

- Interns must not circulate, store and create obscene, vulgar, or inappropriate materials, jokes, pictures, chain letters etc. in any media/form
 - In case any Interns receives such material, they must immediately remove the material, and inform incident Management response team
- Interns must not use or aid by any means attempts to thwart access rights like stealing IP, hacking etc.
- Interns must not indulge in any activity that violates local, state, national and international applicable Laws and information security policy of TresVista, during their association with TresVista
- Interns must not introduce any malicious programs into the network or server (e.g., viruses, worms, Trojan horses, e-mail bombs, etc.)
- Using TresVista computing asset to actively engage in procuring or transmitting material that is in violation of sexual harassment or hostile workplace Laws in the user's local jurisdiction
- Making Fraudulent offers of Products, items, or services originating from any TresVista account
- Making statements about warranty, expressly or implied, unless it is a part of normal job duties
- Port scanning or security scanning is expressly prohibited unless with prior notification
- Executing any form of network monitoring which intercepts data not intended for the Intern's host, unless this activity is a part of the Intern's normal job/duty
- Circumventing user authentication or security of any host, network or account
- Interfering with or denying service to any user other than the Intern's host (for example, denial of service attack)
- Using any program/script/ command or sending messages of any kind, with the intent to interfere with, or disable, a user's terminal session, via any means, locally or via the internet/ intranet/extranet
- Providing information about, or lists of, TresVista Interns to parties outside TresVista
- Coveting Information gathering on or of the Company assets and business activities
- Exporting software, technical information, encryption software, or technology, in violation of international, regional, or local Laws
- Leaving equipment unattended without appropriate protection or security
- Leaving desktop or any information processing facility without locking the user account
- Effecting security breaches or disruptions of network communication including, but not limited to:



- Accessing data of which the user is not an intended recipient or logging into a server
- Account that the user is not expressly authorized to access unless these duties are within the scope of regular duties
- Interfering with or denying service to any user other than the Intern's host (for example, denial of service attack)
- Executing network sniffing, ping floods, packet spoofing, denial of service and forged routing information for malicious purposes
 - Attempt to test a suspected weakness in the environment without authority
 - User will always raise a service request for any change

Non-Compliance

Any non-compliance with the aforementioned policy attracts Disciplinary Actions as per the Annexure.

2.11 Fraud and Whistle-Blower Policy

The purpose of this policy is to establish and define:

- A framework for reporting instances of unethical/improper conduct under the definition of Fraud
- Procedures to review disclosures and direct corrective/preventive action concerning disclosures reported to the relevant authorities within the Organization
- Roles and responsibilities for prevention, detection, and investigation of Fraud within the Organization

Overview

All the Interns and Interns at TresVista act as ambassadors of the Organization and are expected to uphold the principles of honesty and integrity, on which the Organization is built. With the intention of ensuring ethical behavior, TresVista considers it appropriate to provide a channel for Interns and stakeholders to report any behavior which is inconsistent with Firm values and bring to the notice of Compliance department any event or concern that may warrant necessary Disciplinary Action (E.g.: recommending dismissal of a senior Person for dishonesty).

Through this policy, TresVista is committed to supporting and facilitating the detection and prevention of Fraud and ensure an honest, open, and well-intentioned work environment wherein people are assured that they can raise concerns without fear of reprisal, retaliation, discrimination, or harassment.

Scope

This policy applies to any Fraud that is detected or suspected by a 'whistle-blower', and committed by anyone who has a business relationship with TresVista, including but not limited to an Intern, Intern, stakeholder, Client, consultant, vendor, service provider, etc.

Whistle Officer



For the purpose of this policy, the Head of Department - Compliance has been appointed as the Whistle Officer by the Management.

Executive Committee

- The Executive Committee responsible for investigating Fraud comprises of:
 - Chairperson: Managing Director
 - Member: Director
 - Member: Head of Department – HR

Roles and Responsibilities

- TresVista values the integrity of its Interns and recognizes that they have a key role to play in the prevention, detection and reporting of Fraud
- Interns are encouraged to always be vigilant and to report any concerns they may have immediately and must ensure that they:
 - Are aware and informed of the ‘Work ethics’ and ‘Fraud and Whistleblower’ policies
 - Seek advice from their colleagues or reporting authority , when required
 - Offer suggestions on improving the work environment
 - Report potential or suspected violations of the Law or TresVista policy, including situations when they are aware that an Intern, Intern or Third Party engaged with the Firm is currently or will potentially engage in illegal, inappropriate, or unethical activity
- The Head of Departments must ensure that:
 - Interns are communicated the applicability of the ‘Work ethics’ and ‘Fraud and Whistle-blower’ policies within their areas of responsibility
 - An adequate system of internal Fraud control exists within their areas of responsibility and these controls operate effectively
- The Whistle Officer must ensure that:
 - All Frauds are investigated promptly and diligently
 - Guidance is provided in case there is any question as to whether an action constitutes Fraud
- The Executive Committee must ensure that:
 - The investigation process is fair and transparent
 - Appropriate legal and/or Disciplinary Action is taken in cases where it is justified/required
 - Systems and procedure changes as a result of unique cases are incorporated immediately to prevent similar instances from occurring again



Reporting a Suspected Fraud

- Fraud must immediately be reported by the whistle-blower to the Whistle Officer or the Compliance department through any of the modes of communication defined below:
 - **Email:** An email can be sent to requests.compliance@tresvista.com which is accessed by the Senior Vice President and/ or the Compliance department
 - **Written Complaint:** A written complaint can be made and delivered in Person or dropped in the drop box at the following address:
 - Head of Department - Compliance,
TresVista Analytics LLP,
5th floor, North wing block-2, Milestone Buildcon IT SEZ,
Bhartiya Centre of Information Technology,
Thanisandra Main Road,
Bengaluru Urban, Karnataka, India – 560064
- In order to establish reliability of the event, all complaints of Fraud should be supported by the following details:
 - Day, date, time and venue
 - Name of the whistle-blower
 - Names of the Person accused of committing Fraud
 - Details of the unethical or improper activity or suspected Fraud
 - Other witnesses and evidence (if any)
- Irregularities concerning an Intern's moral, ethical or behavioural conduct should be resolved by the department VP/EVP/SVP in consultation with the HR Department and there is no involvement from the Compliance department and the Whistle Officer

Anonymous Allegation

- Though the identity of the whistle-blowers must always be anonymous, it is strongly advised that the whistle-blower discloses his/her identity when making the complaint, as follow-up questions and investigations may not be possible unless the source of the information is identified
- This also ensures timely resolution of the issue and that adequate protection granted to them under relevant provisions of this policy
- Disclosure of the identity is also important to ensure that complaints are authentic and validated prior to pursuing any action
- Disclosures expressed anonymously are generally not investigated



Action on False Disclosures

- This Fraud and whistle-blower policy intends to cover serious concerns that could have a grave impact on the operations, performance and reputation of TresVista
- The policy neither releases Interns from their duty of confidentiality in the course of their work nor does it provide a platform to take up grievances concerning a personal situation
- Fraud reported must not be frivolous in nature and based on conjecture or hearsay. If it is known that false disclosures/complaints are made, then the complainant are Subject to strict Disciplinary Action as the Executive Committee may deem fit

Protection

- Protection is provided to the whistleblower who has reported a Fraud, basis the assumption that the information, and any allegations contained in the report, are substantially true and the disclosure has not been made in the interest of personal gain
- To ensure that this policy is adhered to, and to assure that disclosures are acted upon seriously, TresVista aims to ensure that:
- The identity of the whistle-blower is kept confidential, and protection is provided to the whistle-blower for an indefinite period of time
- The whistleblower and/or the Whistle Officer processing the Fraud are not victimized for doing so
- No adverse personnel action is to be taken or recommended in retaliation to their disclosure of unethical and improper practices or alleged wrongful conduct. This policy protects such Interns from unfair termination and unfair prejudicial practices
- No unfair treatment is vetted out towards the whistle-blower by virtue of having reported a Fraud and they receive protection against:
 - Unfair practices like retaliation, threats, intimidation of termination/suspension of internship, etc.
 - Disciplinary Action
 - Any kind of prosecution, impeachment, or indictment
 - Direct or indirect abuse of authority to obstruct the whistle-blower's right to continue performing their duties/functions during routine business operations, including making further disclosures under this policy
- Appropriate Disciplinary Action is taken against any Person who is found committing any of the above actions against the whistle-blower

Investigation of Suspected Fraud



- The Whistle Officer is primarily responsible for investigating all suspected Frauds based on the communication received from whistle-blowers
- On receipt of a suspected Fraud disclosure, the Whistle Officer must send an acknowledgment to the whistle-blower informing them not to:
 - Attempt to personally conduct investigations, interviews or interrogations in this regard
 - Contact the suspected individual to determine facts or demand restitution
 - Discuss the case, facts, suspicions, or allegations with anyone
- All Subjects must be duly informed about the complaints of unethical practice(s) made against them at the commencement of the formal investigation process and be provided opportunities to explain themselves during the investigation process
- The investigation conducted against any Subject shall not be construed by itself as an act of accusation. The investigation would be conducted in a fair manner, as a neutral fact-finding process, without the presumption of guilt and providing an adequate Opportunity for the affected party to present their side of events
- During the investigation all inquiries concerning the activity under investigation from the Subject, their attorney or representative, or any other Person must be directed to the Whistle Officer. Information concerning the status of an investigation should be kept confidential
- Confidentiality of the information and the Subject should be ensured by the Whistle Officer. If initial inquiries indicate that a complaint has no basis, or it is not a matter to be pursued under this policy, it may be dismissed at this stage and the decision is documented
- During the investigation the Whistle Officer has the:
 - Right to call for and examine any information/document of TresVista
 - Unrestricted access to all TresVista records and premises, whether owned or rented; and without prior knowledge or consent of any individual who might use or have custody of any such items or facilities, as may be deemed necessary for the purpose of conducting investigation under this policy
- If the preliminary investigation substantiates that Fraud has occurred, the Whistle Officer must submit a 'whistle-blower report' to the Executive Committee for their consideration
- Until the investigation is concluded, and decision of the Executive Committee is released, TresVista is not liable or bound to any litigation

Executive Committee Review

- On submission of the whistle-blower report by the Whistle Officer, the Executive Committee must review the findings from the investigation
- The review process is conducted in a fair manner, as a neutral fact-finding process, without the presumption of guilt



- Post the review process, the Executive Committee directs appropriate corrective/preventive Disciplinary Action in cases where there is reason to believe that Fraud has been committed
- The decision of the Executive Committee comprising of all, or any two (2) members are considered binding and final. In the event of a dispute between the members, the decision of the Chairperson prevails
- Decisions to prosecute or refer the examination results to the appropriate Law enforcement and/or regulatory agencies for independent investigation is to be made by the Chairperson of the Executive Committee in conjunction with the Legal department

Reports and Documents

- Investigation results are not to be disclosed or discussed with anyone other than those who have a legitimate need to know
- This is important in order to avoid damaging the reputations of Subject(s) subsequently found innocent of wrongful conduct and to protect the Company from potential civil liability
- All disclosures made by the whistle-blower, the whistle-blower report, and the documents obtained during the investigation, along with the results of the investigation relating thereto, must be retained by TresVista for a minimum period of four (4) years

Compliance

- Head of Department - Compliance submits on a quarterly basis to the Board and Senior Management, summarizing the Fraud cases along with the following details, as applicable:
 - The nature of cases reported under this policy and the proposed action thereon
 - The status of Fraud cases reported in the previous and current period and action taken thereon
 - Results/status of any investigations/enquiries in reference to the Fraud cases reported
- Head of Department - Compliance is responsible for the administration, revision, interpretation, and application of this policy. The policy is to be reviewed annually and revised as needed

TresVista Powers

This policy is hosted on the TresVista website and is available to all Interns in the Organization. A hard copy of this policy is made available to any Person on demand. TresVista reserves its right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever, after due consultation with the Executive Committee.



3. Working at TresVista

The purpose of this section is to educate Interns on general office policies and guidelines pertaining to their day-to-day operations.

3.1 Work Hours and Attendance

This policy is to inform Interns about the guidelines concerning office hours, shifts, and attendance.

Work Hours

- **Office Hours:**
 - The timings shall be decided by the Company from time to time, Subject to work commitments and responsibilities of the Interns. The Interns:
 - Shall be required to adhere to the office hours as may be intimated from time to time
 - Understands and agrees that no compensatory offs are provided by the Company for working late and/or on weekends or Firm-wide Holidays
 - Understands and agrees that the compensation payable is a part of his/her internship stipend and no separate payments would be paid to the Interns for working late or on Holidays
 - The Company may, at its discretion, vary its working hours for any specific Intern to meet its requirements on giving the Intern reasonable notice. If requested to do so by the Company or their reporting authority, the Intern must keep such records and permit such monitoring or restrictions of the working time as the Company requires
- **Flexibility:** If the Intern has worked late the previous night or is aware they will be working late in the current day, they may be permitted the flexibility of reporting late to work to the extent permitted by the reporting authority. Further, an Intern may be excused from the office early if they arrived at work early, to the extent permitted by the reporting authority. However, Interns shall be required to obtain prior consent from their reporting authority for all situations when reporting after or leaving before office hours, otherwise, the day may be treated as a personal/unpaid day at the discretion of the reporting authority
- **Emergency Work Requests:** If an Intern knows they will be unavailable on a weekend or a Holiday or will take more than usual time to reach office, they must inform their reporting authority in advance so that the reporting authority can plan any last minute or emergency work demands accordingly. Consistent unavailability outside office hours must be avoided

Attendance

- When working from office, Interns are expected to use the biometric on every entry and exit



- Tailgating will be counted as non-compliance to office rules and will lead to consequences per the consequence matrix of the physical security policy (Mentioned in the annexure of this Handbook)
- Interns must apply for leaves availed by them, using the 'Leaves and Flexwork' module on Darwinbox, if applicable
- When working from home, Interns are expected to clock-in on Darwinbox, to mark their attendance for the day
- In case Interns are unable to record their leaves/attendance for the day or missed using the biometrics in the office, they may regularize it on DarwinBox, the next day
 - Failure to do so will lead to the day(s) being marked as a leave on Darwinbox
- An Intern must notify their reporting authority when they are away from their desk for an extended period of time
- All Interns must ensure that any attendance request or leave taken is applied for and approved on Darwinbox per the timeline decided by the Corporate Finance department, otherwise these days will be auto-deducted from their Vacation Days balance
- In the absence of a sufficient Vacation Days balance, these days will be marked as unpaid leaves. The process in this regard is defined below:
 - Interns are eligible to receive 75% of their stipend for these days in the next stipend cycle Subject to reporting authority's approval, however, a standard 25% deduction for each day, will apply
 - To receive this amount, Interns must share reporting authority's approval with the Corporate Finance department within the current month's attendance timeline
- Absence due to contingencies:
 - In case of any unforeseen situation, Interns are expected to inform their reporting authority before 9:00 AM if they will be delayed or absent. Tardiness may result in the reporting authority marking the day as a leave
 - In case of unforeseen situations, such as bandhs or public transportation strikes, Interns are expected to work from home. In case they are unable to work from home, this day(s) will be deducted from the Intern's leave balance unless such a day is declared to be a Holiday

Working in Shift

Interns working in shifts can reach out to their reporting authorities for details related to eligibility, shift-structure, reimbursements, etc. Any updates/changes to these details will be communicated to the Interns, as and when required by the Company/respective reporting authorities, as applicable

3.2 Hybrid Guidelines

The purpose of this policy is to provide a framework to Interns on working from the office/home per the hybrid guidelines.



Applicability

This policy is applicable to all Interns.

Particulars

- **Working from Office:**
 - Interns across departments/team are required to work from the office as communicated by their reporting authority
 - The defined guidelines on working from the office are applicable only on working days and not weekends/Holidays
 - **New Joiners:**
 - Interns may be required to work from the office/training venue until their training period is completed, as directed by their reporting authority
 - **Interns serving Notice Period:** Interns may be required to work from the office as instructed by their reporting authority while serving their Notice Period, however, they should mandatorily work from office on their Last Working Day (deviation process does not apply on the Last Working Day)
- **Working from Home:**
 - Interns may be required to work from home as instructed by their reporting authority. When working from home, it is recommended that Interns are based out of their respective base locations
 - Interns are required to work from any location within India only
- **Seating:**
 - Each team has been allocated a defined number of seats and Interns can utilize the seats allocated to their team
 - The detailed floor plan can be referred to on the SharePoint
 - **Pune and Bengaluru:** Open floor seating plan is followed, wherein Interns are not required to book seats and can directly utilize one of the seats allocated to their team
 - **Mumbai and Gurugram:**
- Seating is managed via the SpotHold Portal and Interns are required to book a desk for the days they intend to work from the office
 - Interns are only allowed to block seats in their allocated seating area
 - Interns can block seats on the SpotHold Portal for a maximum of thirty (30) days in advance
 - Further details can be referred to in the SpotHold Portal User Manual, saved on the SharePoint



3.3 Dressing Guidelines and Personal Grooming

Eligibility

This policy is applicable to all Interns.

Particulars

- Interns are required to adhere to the dressing guidelines set by the Company and it is reporting authority's responsibility to ensure that their teams adhere to these guidelines
- In case the HR Compensation and Benefits 2 team (compensation2@tresvista.com) notices any Intern deviating from the guidelines, the respective reporting authority is notified and required to enforce the consequence matrix, as defined below
- A summary of the guidelines is mentioned below, and the detailed manuals should be referred to on SharePoint
- **Working from the Office:**
 - **Monday to Thursday:** Business casual, although business formal is recommended
 - **Friday:** Casuals
 - **Client Visits:**
 - If an Intern is meeting a Client or attending meetings outside the office on behalf of the Company, they are expected to be dressed in business formals
 - If a Client is visiting the office premises, all Employees and Interns are notified in advance about the appropriate dress code
- **Working from Home:**
 - **Friday Casuals:** Day to day operations, internal training, or webinars (excluding induction training)
 - **Business Casuals:** External meetings, induction training, calls with Clients/Management and conducting internal meetings with more than ten (10) attendees
- **Weekends:** No dress code
- **Consequence Matrix:**
 - Interns not adhering to the defined guidelines will be asked to leave the office premises and mark the day as an unpaid/personal/vacation leave as applicable
 - This consequence will apply irrespective of the time at which the Intern is asked to leave the office
 - When enforcing the consequence matrix reporting authorities are required to email the Interns notifying them of this and keep the HR Compensation and Benefits 2 team (compensation2@tresvista.com) marked on this communication



- **Approval Mechanism for Deviations (Health/Religious Reasons):**

- If Interns cannot adhere to the guidelines due to health or religious reasons, they must seek email approval from their reporting authority (VP and above), at least one (1) day in advance and mark the HR Compensation and Benefits 2 team (compensation2@tresvista.com) on all such communications
 - The email must have a defined time-period along with the reasoning for deviating from the policy
 - Reporting authority can approve policy deviations up to a maximum period of 10 consecutive working days i.e., two (2) weeks at their level
- Any requests to deviate from the policy for any reason (apart from health/religious reasons) or for more than 10 consecutive working days i.e., two (2) weeks will require an approval from the Exceptions Committee (exceptions@tresvista.com)
 - In the interim, until Interns hear back on their approval request, they must adhere to the policy, or avail of their leave balance if they are unable to do so

These deviations, if approved by the Committee, are effective immediately and cannot be backdated

3.4 Communication

Given TresVista's diverse team and Client base, communication is integral to its success. For the sake of smooth and effective flow of communication, English will be the official language for all purposes.

The following communication channels are used within the Company:

- **Direct Communication:** Interns are encouraged to speak directly to their reporting authority regarding any day-to-day concerns/queries they may have (E.g., Functioning of the team, work related queries, etc.)
- **Helpdesk:** For any operational concerns/queries/requests, Interns should raise a Helpdesk Ticket with the respective departments. If Interns are dissatisfied with the resolution, they may escalate it in accordance with the defined SLA matrix, saved on the SharePoint
- **Viva Engage:** Viva Engage is the internal social networking platform of the Company with the aim of bringing together Employees and Interns across locations and teams. Interns can participate in events, share their thoughts/achievements/ milestones and engage with other Employees and Interns through this platform

TresVista prides itself on a culture based on openness and transparency. Any feedback or suggestions to improve the workplace are welcome.

3.5 Company ERPs

The Company has 2 enterprise resource planning (ERP) systems – Darwinbox and Microsoft Dynamics 365 to manage day-to-day internal activities of the Interns.

- A login ID and password will be provided to each Intern upon joining



- Interns can log-in to ERPs using the single sign-on (SSO) feature
- Manuals with detailed guidelines on how to use the below ERPs are available on the SharePoint
- It is recommended that Interns log-in to the below ERPs through Microsoft Edge to avoid any bugs that may arise in other browsers
- **DarwinBox:**
 - DarwinBox allows Interns to record and manage their personal information, leaves, attendance, etc.
 - The system can be accessed through: <https://tresvista.darwinbox.in/>
- **Microsoft Dynamics 365:** Microsoft Dynamics 365 allows Interns to record their expense reimbursements and to access project hours, etc.

3.6 Personal Information

The 'Personal Information' module under the 'Profile' section on Darwinbox records each Intern's personal details such as educational qualifications, past work experience, contact information, food preference, etc. The Intern is required to fill in this page upon joining. At any given time, the 'Profile' page must remain updated. If there is a change in any details, the responsibility lies with the Intern to update the page immediately. The Management, respective reporting authority, and the HR Department have access to this page. An Intern is required to submit personal documents, as mentioned in the internship agreement, before they join the Company. The Intern is responsible to ensure the personal Information page on Darwinbox is updated; for instance, change in address or certification received. These documents are uploaded on Darwinbox and will reflect in the 'Personal Documents' page of an Intern. The documents include but are not limited to the Intern's passport, PAN card, mark sheets, driving license, and experience letters, if any. The Management, the Accounting Team, and HR Departments have access to these documents.

All personal information is kept strictly confidential.

In the course of internship with the Company, the Company may obtain or have access to certain information about the Intern or his/her experience with any previous Organizations, including but not limited to information about the work done and performance, health, education, contact details, absence from work and information obtained from Background Verification checks (collectively, "Personal Information"). The Company will use personal information in connection with the internship with the Company, in order to fulfill its legal and regulatory obligations, as may be applicable.

TresVista can leverage an Intern's pictures and videos for the various marketing and communications materials and showcase the Intern engagement initiatives, reflecting culture and growth of the Organization. The content will be used for (including but not limited to) internal communication (e.g., Company/department updates, Viva Engage posts, etc.),



external communication (e.g., Company website, social media posts, PR notes/articles, Company newsletter, etc.), and other print and digital communications as deemed appropriate by TresVista.

Due to the global nature of the Company's business and need to centralize the Company's information and technology storage systems, the Company may transfer, use or store an Intern's Personal Information in a country (including the United States) or continent outside the country where the Intern works or lives, and may also transfer an Intern's Personal Information to its other group companies, and third-party service providers, as necessary or appropriate in the Intern's home country, the United States or other countries, and to any party that it merges with or which purchases all or a substantial portion of its assets, shares, or business (any of which may be located outside the country or continent the Intern works or lives).

The Company may also disclose an Intern's Personal Information when it is legally required to do so or to governmental, fiscal, or regulatory authorities (e.g., to tax authorities in order to calculate appropriate taxation,). The Company may disclose Personal Information as noted above, including to any of the third parties and for any of the reasons listed above, without further notice to the Intern. By receiving the Intern Handbook, the Intern consents to TresVista collecting, retaining, disclosing, and using Personal Information as outlined above and to transfer such information Internationally and/or to third parties for these purposes.

3.7 Personal Use of Company Resources

The use of Company Resources for personal use is a privilege and not an entitlement and may be revoked at any time.

Such use must:

- Be limited, infrequent and reasonable
- Be lawful, ethical, and efficient
- Incur no or minimal additional cost to TresVista
- Not impact the Intern's productivity
- Not interfere with the operation of the Company, or contravene Law
- Not interfere with or distract any other Intern or Intern from their work

The Management and staff have the right to track usage of Company Resources to determine whether usage or involvement is excessive or inappropriate.

3.8 Phone Etiquettes

All Interns are expected to be reachable on their cell phones even when not in office.

It should be noted that:

- Interns must not have any caller tunes and/or disruptive ring tones as it is unprofessional



- While at work, the volume on the cell phone must not disturb people around. It is advised that Interns keep their phones on silent, while working from the office
- Messaging during meetings and discussions should be avoided as much as possible as it is ill-mannered and disruptive
- Phone games should be restricted to the recreation room or outside the office

Understand that personal communication is inevitable and sometimes necessary. However, it is expected that such communication will be kept to appropriate and reasonable levels.

3.9 Approval Matrix

The purpose of this policy is to establish guidelines concerning approvals in the Company.

Procedure

- Approvals must always be received in the form of a written statement from the required/designated approving authority(ies)
- This policy defines the approval workflows that need to be initiated at the initial or operation stage of specific requests, as applicable
- The approval mechanism or hierarchy to be followed is that the reporting authority and/or the VP should approve the request of the Intern

3.10 Business Travel – Domestic

The purpose of this policy is to define guidelines and criteria for domestic travel of Interns (if any), covering aspects such as travel, accommodation, and various allowances.

Eligibility

This policy is applicable to all Interns travelling within India, for business purposes except for travel between office locations i.e., Mumbai, Pune, Bengaluru and Gurugram.

Particulars

- **Air Travel:**
 - All travel Requisitions and any changes made to the request thereof, must be approved by the Intern's reporting authority, as applicable
 - Business trips must be planned at least four (4) weeks in advance to ensure that they are purchased on reasonable lines, per the limits defined in the Annexure



- Interns must submit the relevant supporting documents if Tickets are purchased at a higher cost and the Corporate Finance department will accordingly evaluate such requests
- Flights should be selected based on cost and convenience and any additional cost incurred for upgrades will not be borne by the Company
- Any additional airfare costs when compared to normal business travel dates must be borne by the Intern
- **Hosts:** In case an Intern is staying with family, friends, or acquaintances, they will be entitled to a host entertainment amount (as per prevailing limits), in order to entertain their host and/or buy them a present. This amount should be spent at the Intern's discretion
- **Daily Allowance:**
 - Interns can claim daily allowance, per the limits defined in the Annexure, for their food expenses while travelling
 - All such expenses are reimbursable upon submission of the relevant receipts/bills
 - Intern may claim this amount in advance based on the number of days they are travelling for, in order to do so, Interns must submit their travel Tickets to the Corporate Finance department who will evaluate and accordingly process these requests
 - In case of extended stay for personal reasons, daily allowance will not be provided
 - On account of extended stay due to personal reasons, any additional airfare/hotel cost when compared to normal business travel dates is borne by the Interns. FMS to inform Corporate Finance department to adjust the excess from the stipend
 - If the additional stay is approved by the reporting authority (SVP and above) and is within budget reasonable limit, then it may be considered
- **Conveyance:**
 - The Company incurs, or reimburses Intern conveyance expenses per day in accordance with the limit mentioned (as per Annexure)
 - When travelling, it is recommended that Interns use public transport to ensure that their commute is cost-effective
 - In case public transport is unavailable, Interns may use their discretion in determining the mode of transport
 - When travelling with other Interns/colleagues, it is recommended that Interns rideshare/carpool, to the extent possible
 - The Intern must submit receipts of these expenses with the Corporate Finance department in order to claim relevant reimbursements
 - In case an Intern is travelling through the day and making multiple stops, it is advisable that they rent a car or cab for the entire day



- In case Interns choose to travel to the business location from an origin point which is any other city other than TresVista office locations, the additional cost borne for this travel, if applicable, will be borne by the Intern. Same will be applicable for reverse travel
- **Client Welfare:**
 - Interns are allowed to claim reimbursements up to a certain amount (as per Annexure) for Client related expenditure such as business meal or drinks with a Client
 - These expenses are adjusted within the daily allowance
 - While claiming this amount, Interns must provide the following information to the Corporate Finance department:
 - Name of the individuals, Company and their designation in the Company
 - Location details of the place where the meal or event was organized
 - Amount and date of expense
- **Weekend:**
 - When business travel requires a weekend stay, only food and accommodation expenses are reimbursed;
 - Conveyance expenses are reimbursed if the Intern travels on the weekend for business purposes
 - Interns will need to inform the FMS department/travel desk, as applicable in advance if they need to stay over the weekends due to business requirement for them to book/rebook hotel/flights, Subject to reporting authority approval
 - Interns staying the weekend without any intimation/approval will need to bear the additional cost. FMS needs to inform Corporate Finance department to adjust the excess from the stipend accordingly
- **Miscellaneous:**
 - Office services (i.e., faxes, copies, courier, postage)
 - Reasonable laundry, dry cleaning, ironing for trips exceeding seven (7) days
- **Non-allowable Expenses:**
 - Unsanctioned trips, entertainment, gifts and/or donations
 - Mini bar items
 - Toiletries and other personal items
 - Membership fees to register for any reward program
 - Service, installation and/or repairs cost of personal mobile phones
 - Expenses on tobacco
 - Repair, maintenance of briefcases, luggage or similar items
 - Loss of cash or other personal property



- Personal medical supplies
- Excess baggage charges
- Expenses for travel incurred by companions/ family members
- Other travel expenses considered as ‘not necessary’ during the trip

Procedure to Claim Reimbursements

- The allowance limits for business travel – domestic are mentioned in the Annexure
- For detailed information concerning the reimbursement process, Interns must go through section 6.1 of this Handbook
- A few additional guidelines for claiming expenses for business travel are as follows
 - All reimbursement entries for business travel must be made on Microsoft Dynamics 365
 - E.g.: When travelling for campus recruitment, reimbursement details must be as follows:
 - Client: HR Recruitment
 - Project: Analyst Financial Services 2020 (Relevant project name)
 - If an Intern is unable to submit the original receipt, the expenses claimed will be Subject to additional scrutiny, and will be approved/accepted at the discretion of the Corporate Finance department
- All the bills need to be submitted in electronic mode to Corporate Finance department

3.11 Gift Policy

The purpose of this policy is to define guidelines in order to restrict Interns from directly or indirectly, offering, giving, requesting, accepting any bribe (i.e., gifts with mala-fide intentions, loan, payment, reward or advantage, either in cash or any other form of inducement) from Clients, business associates, vendors or competitors thus observing and upholding TresVista’s position on bribery and corruption.

Applicability

This policy applies to all Interns of TresVista. Further it also applies to any stakeholder, Client, consultant, vendor, service provider, external agency or any other parties who have a business relationship with TresVista

Policy

- Intern must not directly or indirectly solicit or accept cash/cash equivalents or any other gift from any stakeholder, Client, consultant, vendor, service provider, external agency or any other parties who have a business relationship with TresVista or give any sort of gift to a Client or vendor without following the defined approval matrix
- Interns are not allowed to accept any gifts or give any gift from/to competitors



- It is prohibited, directly or indirectly, for any Intern to offer, give, request or accept any bribe (i.e. gifts with mala-fide intentions, loan, payment, reward or advantage, either in cash or any other form of inducement), to or from any Person or Company in order to gain commercial, contractual or regulatory advantage for TresVista, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical
- Intern on behalf of TresVista should:
 - Not offer, promise, or make any bribe or unauthorized payment or inducement of any kind to anyone
 - Not solicit business by offering, promising, or making any bribe or unofficial payment to suppliers
 - Not request or accept any kind of bribe or unusual payment or inducement that would not be authorized by TresVista in the ordinary course of business
 - Refuse any bribe or unusual payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation; and to report any such offers
 - Not make facilitation payments. These are payments used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement
 - Report any breaches of this policy to the Compliance department

Approval Matrix

- Interns need to take approvals for accepting/giving any gifts from/to Clients, business associates, and vendor as per the below defined approval matrix

Amount	Approval (Via Helpdesk)	Authority
Up to INR 10,000	Intimation	VP/EVP Compliance department
Up to INR 20,000	Prior approval	Head of Department Compliance department
INR 20,000 above	Prior approval	Management Compliance department

- Compliance department reserves the right to ask Interns to return the received gifts
- Post receiving approvals, all Interns should intimate the Inside Sales department (insidesales@tresvista.com) when they receive from or give a gift to a Client
- Gifts may include (but are not limited to) compensatory favours (team dinner, donations, comp-offs), vouchers, souvenir, event passes, etc.



- This process should be followed for the purpose of tracking favours between TresVista and its Clients

Intern Awareness

At TresVista, training is provided to all new interns as a part of the induction process.

Compliance

- The Compliance department verifies adherence to this policy through various methods, including but not limited to, walk-throughs, and Internal Audits conducted monthly
- The department will verify cost of the gifts and adherence to the above approval matrix

Non-Compliance

Any non-compliance to the aforementioned policy shall attract Disciplinary Actions as defined in the Annexure of this Handbook.

3.12 Parking Policy

The purpose of this policy is to define guidelines for allocating parking spots to Interns across all office locations.

(A) Mumbai

Eligibility

This policy is applicable only for two (2) wheeler vehicles.

Particulars

- TresVista helps Interns secure a paid parking spot located 150 meters from the office location
- Paid parking spots are allocated on a monthly basis effective the first of every month and the details of the available paid parking spots are shared with Interns by the FMS department, one (1) week prior to the effective date
- Interns interested in availing of these parking spots are required to make a cash payment of INR 500 per month, to the FMS department
- These spots are allocated on a first come first serve basis, and if a parking spot is not allocated, the amount is refunded by the FMS department

(B) Pune & Bengaluru

Eligibility

This policy is applicable to all the Interns.



Particulars

- **Parking Spots for Four-Wheeler and Two-Wheeler Vehicles:**
 - Interns can secure a parking spot in the office parking premises, if they have been allocated a parking spot basis the criteria defined in the below process
- **Points to Note:**
 - Interns are required to share the necessary details through a parking survey rolled out by the HR Compensation and Benefits 2 team (compensation2@tresvista.com) on a quarterly basis
 - Parking spots are allocated per the below-defined criteria, weighted uniquely, on a first-come, first-served basis:
 - Designation/role (levels within the same designation are treated at par, e.g., Associate Year 1 and Associate Year 2 both are considered under the Associate bracket)
 - Tenure in the Firm
 - Distance between the office and their residence (in kms)
 - Once a parking spot has been confirmed, Interns are assigned a mechanical or non-mechanical spot, basis the specifications of their vehicle. The priority of allocating non-mechanical spot is defined below:
 - Full-sized SUVs/MUVs
 - Mid-sized SUVs/Sedans
 - Hatchbacks/Electric
 - HR Compensation and Benefits 2 team shares the status of allocation with Interns at least five (5) working days prior to the effective date
 - After the allocation is confirmed by the HR Compensation and Benefits 2 team, FMS department shares details such as spot number, etc. at least one (1) working day prior to the effective date

(C) Gurugram

Eligibility

This policy is applicable to all the Interns.

Particulars

- **Parking Spots for Four-Wheeler and Two-Wheeler Vehicles:** Interns can secure a parking spot in the office parking premises, if they have been allocated a parking spot basis the criteria defined below
- **Points to Note:**
 - All Interns are required to share the necessary details through a parking survey rolled out by the HR Compensation and Benefits 2 team (compensation2@tresvista.com) on a quarterly basis



- Parking spots are allocated per the below-defined criteria, weighted uniquely, on a first-come, first-served basis:
 - Designation/role (levels within the same designation are treated at par, e.g., Associate Year 1 and Associate Year 2 both are considered under the Associate bracket)
 - Tenure in the Firm
 - Distance between the office and their residence (in kms)
- HR Compensation and Benefits 2 team (compensation2@tresvista.com) shares the status of allocation with Interns at least five (5) working days prior to the effective date
- Interns securing a parking spot are required to get the parking sticker affixed to their vehicle by coordinating with FMS department. Post which they will be given access to book a parking spots on the SpotHold Portal and are required to book a spot for the days they intend to work from the office
- Booking spots through the SpotHold Portal is on a first come first serve basis, subject to the availability of parking spot
- Parking spots can be pre-booked for a maximum of thirty (30) consecutive days
- Cancelled parking spots are available for other Interns to book on the same day and are automatically confirmed if their desk booking has been self-certified
- Detailed guidelines on booking a parking spot can be referred to in the User Manual, saved on SharePoint
- Further details are mentioned under the sub-section 'General Guidelines', at the end of this policy

General Guidelines (Applicable to All Locations)

The following guidelines on parking apply to Interns across all office locations:

- Interns can opt for only one parking space, either a two (2) or four (4) wheeler vehicle, as applicable
- In case an Intern does not respond to the survey/email within the defined timeline, their request for a parking spot is not considered for that quarter
 - Interns raising a request for a parking spot in the middle of a quarter, do not receive a parking spot in the office premises for that quarter and can apply for a parking spot in the next quarter
- Interns joining in the middle of a quarter can raise a request for a parking spot with the HR Compensation and Benefits 2 team (compensation2@tresvista.com) and a parking spot will be allocated Subject to availability of parking spots in that particular office location
- Interns should refrain from sharing their allocated/booked parking spots with other Employees or Interns, i.e. they should park their vehicle only at the allocated/booked spot
 - Interns securing a four-wheeler parking spot cannot use it to park their two-wheeler vehicles and vice versa



- Interns not securing a parking spot for the given quarter should refrain from getting their vehicles inside the parking area of the office premises. Failure to do so may lead to disciplinary action as per the building security guidelines
- If an Intern is not using the parking spot allocated to them, they must inform the HR Compensation and Benefits 2 team (compensation2@tresvista.com) and the slot is accordingly reallocated to another Employee or Intern
- Interns are not permitted to park their vehicles in the office parking premises overnight
- **Night-Time Parking:**
 - As per the building security guidelines, all Interns are prohibited from bringing their vehicles inside post 10:00 PM, on any day of the given week
 - Interns must inform the FMS department (fms@tresvista.com) via email if they need to bring their vehicle inside the office parking premises, in case of any emergencies/urgent deliverables, post 10:00 PM
- **Weekend Parking:**
 - Weekend parking is permitted from 9:00 AM to 6:00 PM only in case Interns are required to visit the office premises for work purposes. However, if Interns have occupied a parking spot throughout the day, they are not required to vacate it post 6:00 PM
 - Interns who have secured a parking spot for the given quarter:
 - **For Mumbai:** Interns must book their spot through SpotHold Portal (applicable for four-wheeler vehicles)
 - **For Pune and Bengaluru:** Interns can occupy the parking spot allocated to them
 - **For Gurugram:** Interns must book their spot through SpotHold Portal. As per the building security guidelines, parking is not permitted on Sundays
 - Interns who have not secured a parking spot for the given quarter, must inform the FMS department via email at least two (2) hours in advance before arriving at the office premises:
 - **For Mumbai:** Interns can occupy parking spots in the B4 parking area reserved for TresVista (applicable for four-wheeler vehicles). Such spots are marked with specific signages for easy identification
 - **For Pune, Bengaluru and Gurugram:** Interns can utilize the vacant parking spots which are reserved for TresVista. Such spots are marked with specific signages for easy identification
- Interns herein agree to park their vehicle on their own risk. TresVista herein is responsible only to facilitate the parking spots available to its Interns. Any and all damage to, or theft of the vehicle, or of any personal property left in the vehicle or in the parking premises is the sole responsibility of the Intern, and TresVista is not liable for any of those losses suffered by the Intern



Non-Adherence to the Policy

- Any non-adherence to this policy shall lead to Disciplinary Action which may include but not be limited to policy reminder, re-training, impact on review rating, issuance of warning letter, or termination

3.13 Performance Review for Interns

The purpose of this policy is to provide a performance review to the Interns at the end of their internship program.

Eligibility

This policy is applicable to Interns completing the defined duration of their internship program.

Particulars

- Interns may receive a performance review based on the expectations stated at the start or during the internship program
- The performance review may be based on constant performance monitoring and objective feedback
- The review may be evaluated by the Company appointed representative at the end of the internship program
- Based on the performance review, Interns may be offered permanent internship with Tresvista at the end of the program

3.14 Travel and Security Policy

The purpose of this policy is to provide guidelines to all Interns exiting the office premises post the legally mandated timelines or post 9:00 PM, as applicable.

(A) For Female Interns Exiting Office Premises Post the Legally

Mandated Timeline

(I) Mumbai, Pune, and Bengaluru

Eligibility

This policy is applicable to all female Interns if they are exiting the office premises post the legally mandated timeline:

- Mumbai and Pune: 9:30 PM
- Bengaluru: 8:00 PM



Particulars

- The Company will provide transportation service to the female Interns exiting post the legally mandated timelines, as applicable, for a safe commute to their residence
- First trip will be available thirty (30) minutes post the legally mandated timelines
- As a part of this service, female Interns will be accompanied by a Company-appointed Male Representative, to their residence, as per the address mentioned in the Company records (DarwinBox)
- **Approval Matrix:**
 - Female Interns can avail this service, Subject to the reporting authority's approval. In the absence of reporting
 - authority, the approvals will be sought from the head of the department
 - For female Interns undergoing training, the approval will be sought from the Training department
- It is mandatory for all female Interns to exit from the reception area (where the security guard is available) when exiting the office premises post above-mentioned timelines

Procedure

- **For female Interns exiting post the legally mandated timeline and opting for transportation service provided by the Company:**
 - A Helpdesk request must be raised with the FMS department under the category of 'Ground Transport Services' with the necessary details
 - Requests must be raised and approved by the Manager (as applicable) minimum ninety (90) minutes prior to the departure
 - In case female Interns inform the FMS department about their requirement less than ninety (90) minutes prior to their departure, a justification will be sought from their Manager, post which, if possible, a cab will be booked on the spot, Subject to availability
 - Requests will only be initiated after receiving the necessary approvals, as applicable
 - Incorrectly raised requests may lead to a delay in processing the requests
 - Requests shared via any other platform (E.g., verbal requests, emails, Microsoft Teams, etc.) will not be processed
 - Addresses updated on DarwinBox will be referred by the FMS department at the start of each quarter
 - In case the current residential address differs from the one mentioned on DarwinBox, a softcopy of the updated address proof (E.g., rent agreement, Aadhaar card, PAN card, driving license, etc.) must be attached as a one-time activity, while raising the request, after which FMS department will update the address in their records



- Female Interns in the initial ninety (90) days from the date of joining are exempted from providing a softcopy of their updated address proof, in case of a change in their residential address. However, they are mandatorily required to fill in their updated address on DarwinBox by 3:00 PM on any given day
 - Post completion of the initial ninety (90) days, female Interns must mandatorily provide a soft copy of their address proof in case of change in their address
- In case of deferring address from the one on DarwinBox or no proof of address change is attached while raising a request, it will not be processed further. Female Interns are then required to plan the commute on their own in line with the guidelines specified under 'For female Interns exiting the office premises post the legally mandated timeline but not opting for the transportation service provided by the Company'
- In case of change in address, female Interns should ensure that their current address is updated on DarwinBox at the earliest
- In case the current address is not updated on DarwinBox by the beginning of the next quarter, female Interns will still be required to attach the address proof while raising the request
- Female Interns should update their personal and emergency contact details on DarwinBox as soon as there is a change in these details
 - Once the travel request is approved by the Manager, the FMS department will share the following details via email closer to the departure time, as applicable:
 - Departure slot and pick-up location,
 - Female Interns are required to be at the pick-up location five (5) minutes prior to their departure time
 - Details of the car (vehicle type, number, etc.)
 - Details of the driver and/or Male Representative (name, contact details, etc.)
 - Do's and don'ts to be followed during the trip
 - Link to the acknowledgement survey form which must be mandatorily filled in/responded by female Interns on the safe arrival at their doorstep
 - This service, across all office locations and drop distances (within a reasonable limit from the office premises), will be provided in intervals of 90 minutes, on a first come first serve basis
 - Multiple female Interns residing on the same route can be accommodated in one trip
 - No in between stops/halts will be allowed from the office premises to the residential address



- This service will be provided Subject to the logistical requirements, such as availability of cabs, Male Representatives, etc.
- Conveyance reimbursements claimed by female Interns for the days they opt for this service, will be rejected by the Corporate Finance department
- On days when female Interns are working from another office location and wish to avail this service, they must include the following details while raising the Helpdesk request:
 - Email approval from their Manager to work from another office location (as an attachment)
 - Temporary address details
- Once female Interns have been accompanied to their residence by the Male Representative, they must mandatorily:
 - Sign the travel receipt confirming that they have been safely dropped off at their residence
 - Respond and submit the acknowledgement survey form mentioned on the email shared by FMS department within fifteen (15) minutes of their arrival at their doorstep
 - A SPOC from the FMS department will call on the registered mobile number of the female Interns to check on their safe arrival, if the response is not received within fifteen (15) minutes from the time they have been dropped off at their residence
 - In case the call is not answered, the FMS SPOC will call the emergency contact as mentioned on DarwinBox in next fifteen (15) minutes
 - In case emergency contact does not answer the call, the FMS SPOC will visit female Interns address (as mentioned on the Helpdesk Ticket) in Person to verify their safe arrival
- **For female Interns exiting post the legally mandated timeline but not opting for transportation service provided by the Company:**
 - A Declaration Register must be mandatorily signed at the office reception if the female Interns exit the office premises post the legally mandated timeline and do not wish to opt for the Company provided transportation service
 - Female Interns, undergoing new hire training outside office premises, must sign the Declaration Register kept at the training venue

Consequence Matrix

- The following consequence matrix will be applicable if the female Interns:
 - Do not inform the FMS department of their safe arrival via the acknowledgement survey form after opting for the Company-provided transportation service, and/or;



- Exit the office premises post the legally mandated timeline without signing the Declaration Register and have opted out of the Company-provided transportation service

Breach 1	Breach 2	Breach 3
Policy reminder to the female Intern	Warning letter	Termination with Cause

- In case female Interns do not utilize this service after the booking is confirmed, the applicable cancellation charges will be borne by them

(II) Gurugram

Eligibility

This policy is applicable to all female Interns if they are exiting the office premises post 8:00 PM.

Particulars

- The company will provide transportation service to the female Interns exiting post 8:00 PM for a safe commute to their residence (doorstep) and it is mandatory for the female Interns to avail it. This is irrespective of them having commuted to work via their personal vehicle or have family members/friends who are willing to pick/drop them to their residence (doorstep)
- First trip will start 9:00 PM onwards to ensure safe commute of female Interns from the office premise to their residence (doorstep)
- As a part of this service, female Interns will be accompanied by a Company-appointed Male Representative, to their residence (doorstep), as per the address mentioned in the Company records (DarwinBox)
- Around 7:00 PM, the transport coordinator will check with all females in the office at that time, if they would be existing post 8:00 PM and accordingly plan routes to minimize the wait time. In case an additional car is needed, necessary arrangements will be made by the transport coordinator. However, the female Interns may have to wait till the car is available
- **Approval Matrix:**
 - Female Interns can avail this service, Subject to the reporting authority's approval. In the absence of reporting authority, the approvals will be sought from the head of the department
 - For female Interns undergoing training, the approval will be sought from the Training department
- It is mandatory for all female Interns to exit from the reception area (where the security guard is available) when exiting the office premises post 8:00 PM



Procedure

- A Helpdesk request must be raised with the FMS department under the category of 'Ground Transport Services' with the necessary details
 - Requests must be raised and approved by the manager (as applicable) minimum one hundred and twenty (120) minutes prior to the departure (Considering it takes approximately one hundred and twenty (120) minutes to procure a car from the vendor and for it to arrive at the office location). The cars will be available at 9:00 PM, however in case the cars are occupied, it will help the transport coordinator to plan the trips to ensure minimum wait time
 - In case female Interns inform the FMS department about their requirement less than one hundred and twenty (120) minutes prior to their departure, a justification will be sought from their Manager
 - Requests will only be initiated after receiving the necessary approvals
 - Incorrectly raised requests may lead to a delay in processing the requests
 - Requests shared via any other platform (E.g., verbal requests, emails, Microsoft Teams, etc.) will not be processed. If the request is shared verbally or on Microsoft Teams, etc., please ensure you raise a request on the Helpdesk for official records
- Addresses updated on DarwinBox will be referred by the FMS department at the start of each quarter
 - In case the current residential address differs from the one mentioned on DarwinBox, a softcopy of the updated address proof (E.g., rent agreement, Aadhaar card, PAN card, driving license, etc.) must be attached as a one-time activity, while raising the request, after which FMS department will update the address in their records
 - Female Interns in the initial ninety (90) days from the date of joining are exempted from providing a softcopy of their updated address proof, in case of a change in their residential address. However, they are mandatorily required to fill in their updated address on DarwinBox by 3:00 PM on any given day
 - Post completion of the initial ninety (90) days, female Interns must mandatorily provide a soft copy of their address proof in case of change in their address
 - In case of change in address, female Interns should ensure that their current address is updated on DarwinBox at the earliest
 - In case the current address is not updated on DarwinBox by the beginning of the next quarter, female Interns will still be required to attach the address proof while raising the request
- Female Interns should update their personal and emergency contact details on DarwinBox as soon as there is a change in these details



- Once the travel request is approved by the Manager, the FMS department will share the following details via email closer to the departure time, as applicable:
 - Departure slot and pick-up location,
 - Female Interns are required to be at the pick-up location five (5) minutes prior to their departure time
 - Details of the car (vehicle type, number, etc.)
 - Details of the driver and/or Male Representative (name, contact details, etc.)
 - Do's and don'ts to be followed during the trip
 - Link to the acknowledgement survey form which must be mandatorily filled in/responded by female Interns on the safe arrival at their doorstep
- This service, basis the drop distances (within a reasonable limit from the office premises), will be provided in intervals of one hundred and twenty (120) minutes, on a first come first serve basis (Considering it takes approximately one hundred and twenty (120) minutes to procure a car from the vendor and for it to arrive at the office location)
 - Multiple female Interns residing on the same route can be accommodated in one trip
 - No in between stops/halts will be allowed from the office premises to the residential address
- Conveyance reimbursements claimed by female Interns for the days they opt for this service, will be rejected by the Corporate Finance department
- When female Interns from other office locations are working from the Gurugram office, and wish to avail this service, they must include the following details while raising the Helpdesk request:
 - Email approval from their Manager to work from another office location (as an attachment)
 - Temporary address details
- Once female Interns have been accompanied to their residence (doorstep) by the Male Representative, they must mandatorily:
 - Sign the travel receipt confirming that they have been safely dropped off at their residence (doorstep)
 - Respond and submit the acknowledgement survey form mentioned on the email shared by FMS department within fifteen (15) minutes of their arrival at their doorstep
 - A SPOC from the FMS department will call on the registered mobile number of the female Interns to check on their safe arrival, if the response is not received within fifteen (15) minutes from the time they have been dropped off at their residence (doorstep)
 - In case the call is not answered, the FMS SPOC will call the emergency contact as mentioned on DarwinBox in next fifteen (15) minutes



- In case emergency contact does not answer the call, the FMS SPOC will visit female Interns address (as mentioned on the Helpdesk Ticket) in Person to verify their safe arrival

Consequence Matrix

- The following consequence matrix will be applicable if the female Interns:
 - Do not inform the FMS department of their safe arrival via the acknowledgement survey form after opting for the Company-provided transportation service, and/or;

Breach 1	Breach 2	Breach 3
Policy reminder to the female Intern	Warning letter	Termination with Cause

- In case female Interns do not utilize this service after the booking is confirmed, the applicable cancellation charges will be borne by them

(B) For All Interns Exiting Office Premises Post 9:00 PM

Eligibility

This policy is applicable to all Interns if they are exiting the office premises post 9:00 PM.

Particulars

- Interns exiting the office premises post 9:00 PM can continue to claim conveyance expenses per the Reimbursements Policy (Refer to section 7.2 of this Handbook)
 - Female Interns exiting the office premises post the legally mandated timelines (9:30 PM for Mumbai and Pune, and 8:00 PM for Bengaluru) must mandatorily sign the Declaration Register, if they do not wish to avail the Company-provided transportation service
 - Female Interns exiting the office premises post 8:00 PM in Gurugram will have to mandatorily opt for the Company-provided transportation service
- It is mandatory for all Interns to exit from the reception area (where the security guard is available) when exiting the office premises post the legally mandated timelines (9:30 PM for Mumbai and Pune, and 8:00 PM for Bengaluru and Gurugram)

3.15 Organizational Hygiene

The purpose of this policy is to ensure that the perception of TresVista is standardized across all platforms and provide guidelines to Interns on how to communicate with internal and external stakeholders.



Eligibility

This policy is applicable to all Interns.

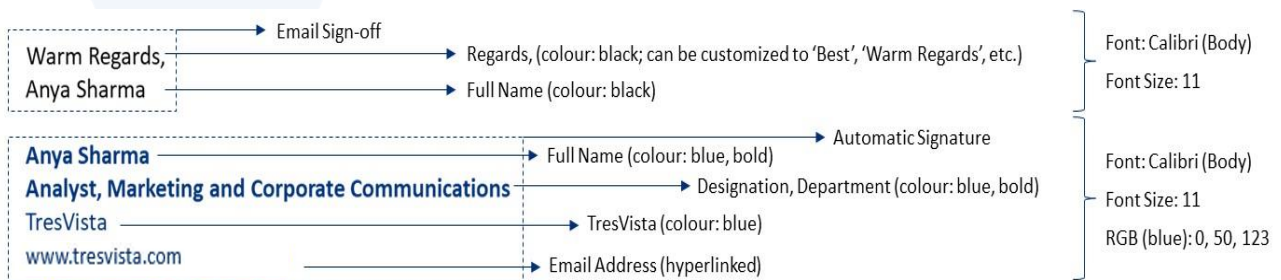
Particulars

Organizational Information and Materials

- Organizational information talks about the Organization, its values, culture, Interns, services, Clients, business operations, partnerships, and activities and is accessible to all Interns in the Organization (E.g., PACT, boilerplate, highlights, value proposition: why Partner with us, geographic presence, Client break-up, TresVista services, TresVista ecosystem, support framework, Client testimonials, Intern count, office information, organizational structure, leadership bios, service delivery model, etc.)
- Organizational materials include but are not limited to pitchbooks, brochures, CSR material, decks, recruitment decks/literature, Firm intro decks, department intro decks, and firmwide training manuals
- Interns using any organizational information and material must refer to the templates saved on SharePoint and ensure that they are using the latest version of data available. These templates will be updated by the Marketing and Corporate Communication department on a quarterly basis

Email Signatures

- Interns are required to sign their emails in the defined format, to maintain certain etiquette and professionalism in the Organization
- SVPs and below:**
 - SVPs and below must follow the standard email signature format, as mentioned below. Default format signatures should not be treated as a replacement for writing an email sign-off (e.g., Best/Warm Regards/Cheers followed by the name of the Intern)
 - The email signature need not be present for consecutive emails that are/become a part of an ongoing conversation
 - Client-facing teams using a Virtual Desktop Infrastructure (VDI) must make an educated decision with regard to email signatures, keeping in mind the Client relationship and Firm guidelines
- Standard email signature format:





Out of Office

- When on leave, Interns should set up a formalized out-of-office response for all internal or external emails and MS Teams messages received in their absence to help notify the sender of their unavailability and inform them of an alternate point of contact
- The standard out-of-office email template, as applicable, is as follows:
 - Hello,
 - Thank you for your email. I am currently on leave with limited access to my emails and will be back on <day>, <month date, year>. In my absence, please reach out to <Alternate Contact> <(Alternate contact's email-id)> for any immediate assistance.
 - Email Signature
- **Internal Emails:** Interns must follow the below guidelines for internal email replies:
 - **SVPs and above:**
 - Decide whether they need an out-of-office email and customize their communication accordingly
 - Help determine the point of contact to be mentioned in the out-of-office email for all team members
 - **EVPs:** Redirect out-of-office emails to their VPs/Associates, as applicable
 - **VPs:** Redirect out-of-office emails to their EVP/Associates, as applicable
 - **Associates:** Redirect out-of-office emails to their VPs/EVPs
 - **Analysts:** Discuss with their reporting authorities and accordingly set an out-of-office email, if deemed necessary
- **External Emails:** Interns must follow the below guidelines for external email replies
 - **SVPs and above in the Client Development department:** Avoid setting out-of-office emails unless they are not able to access their emails for an extended period of time
 - **Client-facing teams:**
 - Large teams with a DL should not have an out-of-office email when individual Interns are on leave
 - For small teams consisting of a VP, an Associate, and an Analyst, it is the responsibility of the EVP or VP, as applicable, to determine whether they should have an out-of-office email
 - **Teams managing external stakeholders other than Clients (e.g., vendors, campus communications, etc.):**
Setting an out-of-office email is not required

Templates

- **Microsoft Teams Background:**



- When not working from office, Interns to use their best judgment on whether to use an MS Teams background for internal meetings, whereas for external meetings, it is advisable to use the standard MS Teams background, as saved on SharePoint
- When attending calls from the office, Interns may choose not to use a background
- Interns may choose to use the celebratory or milestone-related backgrounds sent firmwide
- Interns must not use the generic templates available on MS Teams
- **PowerPoint:**
 - Standard PowerPoint template, as saved on SharePoint, must be used for all internal and external presentations
 - Landscape template must be used for digital copies of the deck, while the letter size template must be used if the deck needs to be printed
- **Word:** Standard Word templates, as saved on SharePoint, must be used for all internal and external documents

3.16 Brand Communication Guidelines

The purpose of this policy is to educate Interns on the set standards that convey how TresVista should be presented in order to maintain a strong brand identity and consistency in communication across various platforms.

Eligibility

This policy is applicable to all the Interns

Particulars

Brand Tonality

- For any communication piece, Interns are required to first analyze the audience, situation, and platform of communication
- **Guidelines on Messaging and Tonality of the Communication:**
 - If the situation requires the tone of the message to be serious, Interns must be transparent, establish a two-way conversation, show that they are genuinely listening, and be approachable in their communication
 - It is expected that Interns are straightforward but not rude in their communication
 - If the communication piece is light-hearted, fun, or celebratory, Interns may structure their message accordingly and make the communication less verbose
 - Interns are encouraged to engage in non-confrontative humor but also have thoughtful conversations
 - Some best practices in this regard are as follows (including but not limited to):
 - Avoid any kind of suggestive innuendos
 - Be humble and respectful



- Enable everyone to understand the communication and also be receptive to their viewpoints
- Do not be authoritative or snobbish
- Help others if possible, aim to not make others feel vulnerable
- A few references in this regard are as follows:
 - Use pop culture references to make the communication more relatable, captivating, and entertaining (e.g., Marvel, cult movies, art, and songs)
 - Encourage teams to use memes, and opt for a young, easily consumable vocabulary (e.g., Mumbai Police Tweets)
 - Avoid words like 'graciously' and 'courteously'
 - Avoid words like 'booze' and 'drugs', instead use 'alcohol', if required and necessary
 - Use 'TVite', instead of the term 'Intern', except for process/policy-related communications

Guidelines for Inclusive Communication

- For any communication piece, Interns must ensure that they are mindful of social sensibilities and social acceptance of words, terms, phrases, etc., as mentioned below:
 - Ensure communication is neutral with regard to physical differences such as gender, disabilities, etc.
 - Avoid using words like 'handicapped' and 'disabled'; instead, use the term 'Persons with disabilities', where appropriate
 - Be careful about using icons that only refer to a man or woman and aim to be more inclusive
 - Use authentic ways to include, portray, and integrate diverse populations, e.g., use gender-neutral pronouns 'they/them' instead of 'he/she,' 'Ms.' instead of 'Miss/Mrs.', 'everyone and all' instead of 'ladies and gentlemen', 'chairperson' instead of 'chairman' and 'chairwoman'
 - Interns must avoid stereotyping and should:
 - Be cognizant of reactions and assumptions and understand that it is important to acknowledge and identify stereotypes
 - Avoid jokes/assumptions that create stereotypical views
 - Avoid false assumptions, stereotypes, and biases that affect the fairness of decision making
 - Examples of stereotypes include but are not limited to:
 - Culture: people from x country are rude
 - Social: x types of people are weird/shallow
 - Racial: people of x race are athletic/good at maths
 - Gender: people of x gender are lazy/beautiful
 - Religious: people who practice x religion are intolerant/generous



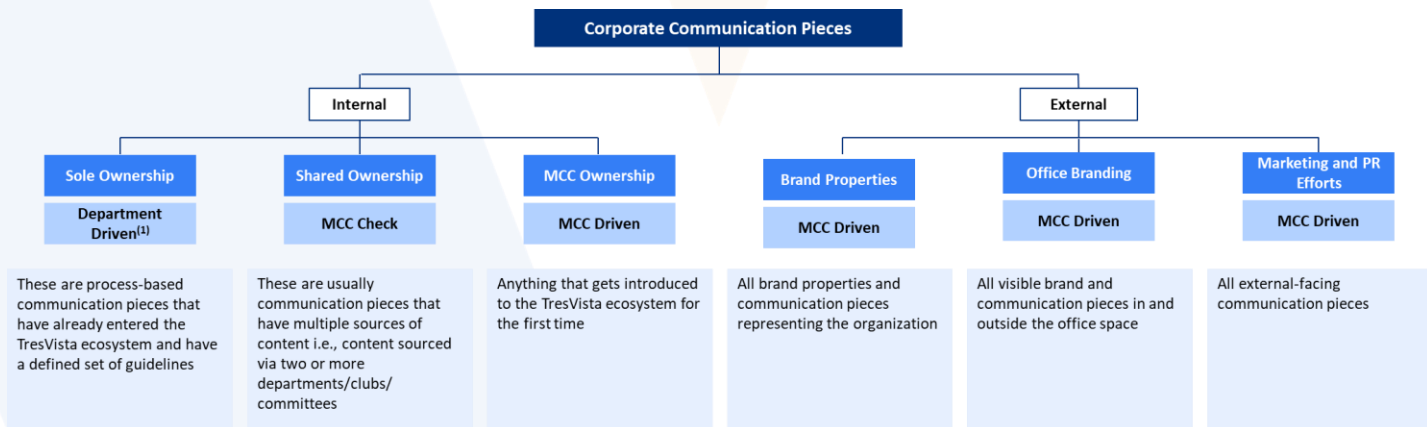
3.17 Corporate Communication Policy

The purpose of this policy is to define guidelines for internal and external corporate communication pieces and have a central authority to help:

- Standardize messaging & tonality across all communication materials
- Maximize efficiency in planning and execution of corporate communications
- Define a systematic and well-structured chain of action to be followed at any point of time

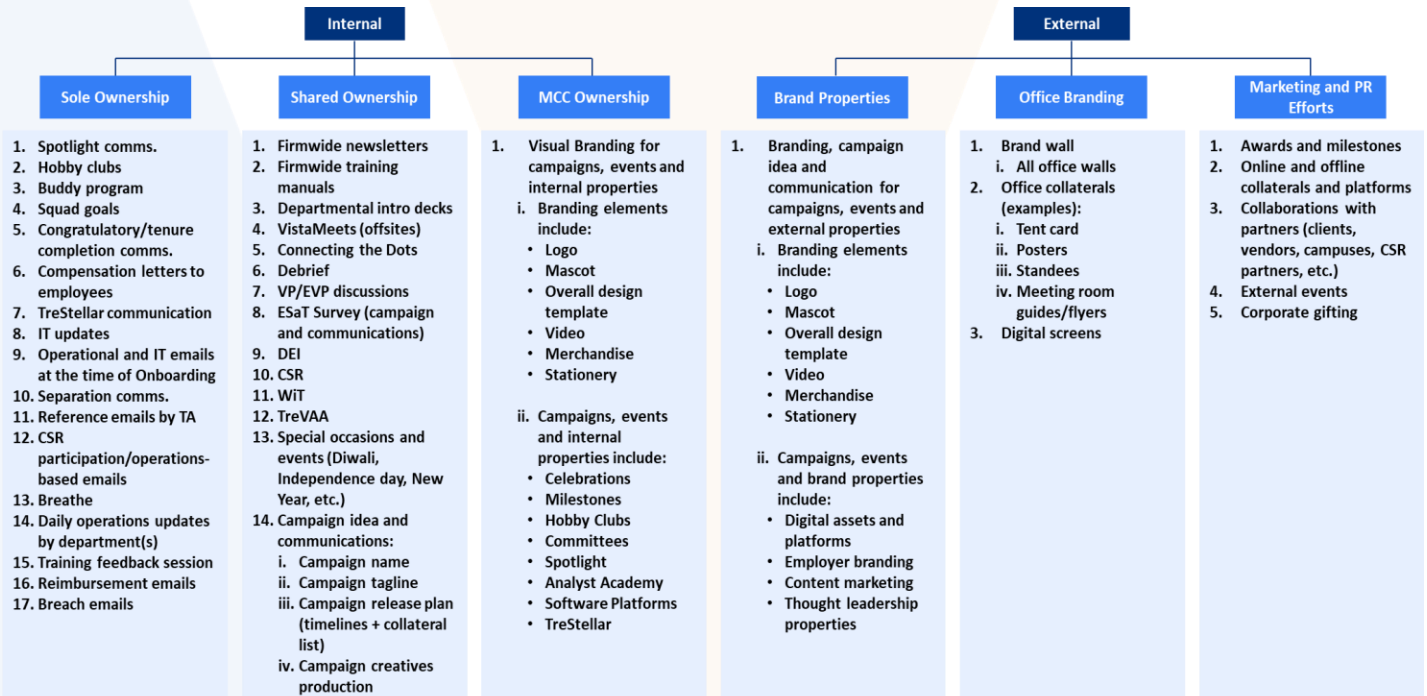
Particulars

- **Corporate Communication Structure:** The corporate communication structure at TresVista consists of two verticals, namely, internal, and external. For any communication, Interns are required to follow the below defined flowchart



Please note that an internal piece can also have an external branding leg to it. For example, hobby clubs have Sole Ownership when it comes to Yammer posts and Firmwide emails. However, as soon as the department wants to put up an office standee or print customized t-shirts for their club or club event, it becomes an external comms. piece

- Examples of corporate communication pieces include but are not limited to:



Internal Communication

Sole Ownership:

- Communication pieces falling under this category include process-based communications that are already in practice within the Organization and follow a defined set of guidelines
- The source for producing this content usually lies with only one team/department and this form of communication does not require another team/department to make a decision
- These communication pieces do not typically involve determining a new strategy or creative route for executing them
- This content is communicated to the Firm at defined intervals, depending on the regularity of occurrence
- Process to be followed:
 - o Decide whether a communication material falls under the category of sole ownership
 - o Get a signoff from the Head of Department before sending any firmwide communication
 - o Follow the brand tonality and guidelines as mentioned in section 3.16 of this Handbook
 - o Use their discretion to determine whether a communication piece requires a Viva Engage post, firmwide email, campaign, or a series of posts; depending on the use case
 - o Be mindful of the target group when sharing information (E.g., If an email is pertaining to Bengaluru, then it should only be sent to the Bengaluru Interns instead of being sent firmwide)
 - o Follow TresVista Branding for any internal communication pieces/Collaterals that are in collaboration with any organizational Partner



- Reach out to the Marketing and Corporate Communications (MCC) department for any communication regarding policy/process changes or in case there is any doubt/uncertainty at any point of time, the team will accordingly inform Interns whether MCC approval is required in a particular scenario
- New initiatives, templates, or campaigns will not fall under this category, and guidelines listed below under the category of shared ownership and MCC ownership will have to be followed (E.g., Pre-decided templates for Spotlight that go on Viva Engage on a regular basis will only need approval from the Head of Department, however, if there is a need to revamp the template, it will fall under the purview of the MCC department)
- **Shared Ownership:**
 - Communication pieces falling under this category include those that receive content from multiple sources i.e., content sourced via two or more teams/departments/clubs/committees
 - Even if only one team/department is the source of content, the nature of this bucket requires a holistic view due to its larger impact on the Firm or brand implications
 - The communication material in this regard may be recurring, however, it will need a fresh perspective every time
 - This category includes communication to departments, functions, Firm or exchange of critical information to specific forums or the Firm
 - This form of communication consists of crucial information that requires cross-checking and its brand impact requires the MCC department to help in planning the communication strategy and crafting the final message
 - Any communication material that involves campaign planning, communication strategy, and/or creative messaging to the Firm or forums will fall under this category
 - Process to be followed:
 - For cross-checking communication materials, reach out to the MCC department at least 1 week in advance and account for a buffer time to incorporate feedback
 - Any change suggested by the MCC department will be in reference to corporate communication, tonality, branding, user experience standardizing organizational information, and sensitivity of the information
 - MCC department may raise information present in these materials to Management for strategic guidance, on need basis
 - For campaigns, special occasions, events, one of the 2 options mentioned below must be followed:



- **Option 1:** Reach out to the MCC department for final checks/approvals
 - Share the required details on campaign idea/plan, creatives, requirement brief to corroborate MCC department's inputs, if any, at least 2 weeks in advance
 - The team will revert on the status and timeline for proceeding with the project/communication piece
 - If the project/communication piece receives initial approval, inputs/feedback provided by the MCC department will need to be incorporated and the final deliverable has to be shared with them for approval
- **Option 2:** Reach out to the MCC department with a requirement brief at least 1 month prior to the initiation of the project/communication piece
 - The team will revert on the status and timeline for proceeding with the project/communication piece
 - If the project/communication piece receives initial approval, the MCC department will share following details via an email within 3 working days: further questions, if any, exact deliverable from their end, timelines for the deliverables, cost, if applicable (in case an external Partner is involved, e.g., leveraging services of the marketing agency)
 - Any project coordination and JRS should be raised by the respective team/department to the Design team keeping the MCC department marked on the communication and the team will share their inputs/guidance, where required
 - In case of any queries, Interns can reach out to the MCC department and the team will inform Interns whether their approval is required in a particular scenario
- **MCC Ownership:**
 - Communication pieces falling under this category include material/projects being introduced to the Company for the first time (e.g., New initiatives, campaigns, and internal brand properties)
 - Process to be followed:
 - Reach out to the MCC department at least 3 months in advance for any brand properties, campaigns, and new initiatives
 - The team will revert on the status and timeline for proceeding with the project/communication piece
 - If the project/communication piece receives initial approval, the MCC department shares the following via email within 1 working week: further questions, if any, exact deliverable from their end, timelines for the deliverables, cost, if applicable (in case an external Partner is involved, e.g., leveraging services of the marketing agency)



- JRS should be raised by the respective team/department to the Design team keeping the MCC department marked on the communication and the team will share their inputs/guidance, where required
- In case, respective teams/department has any feedback; a call is setup to discuss it further however, the final decision lies with the MCC department, keeping in mind the use case and impact
- The MCC department will subsequently share the final deliverable with the respective team/department
- For any communication regarding policy and process changes or in case of any queries, Interns can reach out to the MCC department, and the team will accordingly inform Interns whether MCC approval is required in a particular scenario

▪ **External Communication**

- Any external facing property that represents TresVista in any form falls under this category
 - Examples include but are not limited to external awards, recognition, and milestones (for Organization and Interns), corporate gifting, brand campaigns and properties – external campaign/communication on online and offline platforms, logos, mascots, videos, identities, merchandise, brand assets – Website, thought leadership pieces, social media, digital platforms, any formal or informal media or promotional interaction, including interviews, providing a quote/testimonial to any Organization or Partner, delivering a lecture, or conducting a workshop/session/panel discussion and public speaking opportunities
- There might be several use cases that will be internal in nature as well however, at any point if they have an external branding associated with them, teams/departments will have to follow the guidelines provided below (E.g., A hobby club firmwide email is internal but an office standee will fall under external branding and hence will follow the below guidelines)
- Process to be followed:
 - Interns must reach out to the MCC department in case the requirement falls under the below defined categories:
 - Any team/department/ that wants to use TresVista Branding, including Logo, pennant, values, or any organizational information for external purposes must send an email with the exact use case (where TresVista is to be used in any way) at least 1 (one) month in advance
 - For external campaigns, creation of a brand property, and logo, the department must reach out with a requirement brief at least 2 months before the initiation date, although it is recommended that they reach out 3 months in advance



- MCC department will revert on the status and timeline for proceeding with the project/communication piece
- If the project/communication piece receives initial approval, the MCC department shares the following via email within 1 working week: further questions, if any, exact deliverable from their end, timelines for the deliverables, cost, if applicable (in case an external Partner is involved, e.g., leveraging services of the marketing agency)
- JRS should be raised by the respective team/department to the Design team keeping the MCC department marked on the communication and the team will share their inputs/guidance, where required
- The MCC department will subsequently share the final deliverable with the respective team/department
- Marketing budget expensed, if any, will be attributed to the respective department budget
- Teams/departments are required to assign a certain amount towards the marketing budget for the upcoming financial year which will be transferred to the MCC department at the end of the respective year, depending on the deliverables
- In case of any queries, Interns can reach out to the MCC department and the team will inform Interns whether their approval is required in a particular scenario
- **Marketing and Communication Guidelines for Partners**
 - At the time of onboarding a Partner, departments are required to share TresVista logo files along with the linked document with the Partners the path of the same is: TresVista Common (SharePoint) > Standard Organizational Materials > Partnership Guidelines
 - Department/teams must reach out to the MCC department if a Partner requires any of the following details:
 - A quote or any other information from TresVista
 - Mention TresVista as a Partner on any platform or state that they are affiliated with TresVista in any way
 - Use the Company's logo, name or any information related to TresVista in any of their communication pieces
 - Tag TresVista or its Interns on any online platform
 - Partner's poster/Collateral/marketing material is going to be circulated in TresVista (In such cases, the material needs to adhere to TresVista brand guidelines)
 - Once a request is received from a department, the MCC department will first check the feasibility of proceeding with the aforementioned communication/request and share their inputs within 5 working days
 - Depending on the nature of the request, the MCC department will revert with the expected turnaround time for the deliverable and the required approvals/feedback, if applicable



- **Non-Compliance**

Non-compliance with the policy, in any form, shall lead to Disciplinary Actions including, but not limited to policy reminders, warning letter, or Termination with Cause, at the discretion of the Company.



4. IT Systems and Securities

TresVista provides its Employees and Interns with the latest and most effective information technology and urges them to use the infrastructure optimally and responsibly.

TresVista encourages the use of electronic communications to share information and knowledge to conduct the Company's business. To this end, TresVista supports and provides information technology facilities which include all hardware, software, and services that TresVista provides to its Employees and Interns to help them carry out their day to day official work ("IT Facilities"). An exhaustive list of all IT facilities that the Company provides to its Interns for official purposes is available on SharePoint.

The following sections cover the usage of all of TresVista's IT facilities, whether owned or leased by TresVista or are under TresVista's possession, custody, or control; and all users, whether on TresVista's property, connected remotely via any networked connection or using TresVista's equipment.

If any Intern is found in violation of any of the policies below, it will lead to repercussions as per the compliance matrix.

4.1 IDs and Password

User IDs and passwords help maintain individual accountability for the internet, intranet, and email resource usage, and Interns are responsible for keeping them confidential and not sharing them with anyone.

Interns must change their system passwords once every 30 days. Password can be changed remotely using 'Ctrl+Alt+End' keys. Interns must be connected to the authorized VPN Client before changing the system password.

Interns can raise a Ticket with the Software Department for issues related to Microsoft Dynamics 365.

4.2 Data Usage

- All Interns are responsible for managing their use of information Resources and are accountable for their actions relating to information resource security
- Interns can access their respective network drives/SharePoint sites on Company laptops when they are connected to the authorized VPN Client
 - Network drives/share point sites are backed up per the pre-defined Backup policy
- Interns are allowed to store their Personal Data (e.g., documents, MP3, etc.) on the hard-drive of their local system, however, it cannot not be stored on the network server
 - Interns can raise a Ticket with the IT department to upload their personal files on the drive
 - Data stored on the laptop's local storage will not be backed up, and lost data is not recoverable
 - Any such violations/incidents must be reported immediately so that appropriate action can be taken in a timely manner



- Interns using Company laptops should not leave the device unattended keeping in mind TresVista's Data Security policy

4.3 Software and Hardware

Software includes purchased or licensed business software applications, Company-written applications, Intern or vendor/supplier-written applications, computer operating systems, firmware, and any other software residing on TresVista-owned equipment. All equipment, including desktop computers (PCs), laptops, tablets, terminals, workstations, wireless computing devices, USB flash drives, telecom equipment, networks, databases, printers, servers, shared computers, and all networks and hardware to which this equipment is connected, are covered under hardware. Interns must use TresVista's computers and networks only for legal and authorized purposes.

- For computers dedicated for use by a single Intern end-user
- At the end of each workday or if an Intern plans to leave the computers unattended for a few minutes or longer, lock or power off the computer to prevent unauthorized access. In case the Intern wishes to log on to the system remotely, they should log off and switch off the monitor
- For a computer shared by multiple Intern end-users (e.g., database terminals):
 - Not leave their computer sessions unattended, and instead, log-off if they must leave the immediate vicinity of the computer, then log in again upon return
 - Disconnect from network-accessible Resources, log-off the computer, and make it available for another Intern immediately upon completion of their computer session
- Interns are responsible for the laptops provided to them by TresVista. In case of theft or damage, the Intern must notify the IT and Compliance department immediately through an email
- In case of damage, Intern have the responsibility to raise a case with the OEM for repair and replacement
 - Any loss or damage to Company-issued laptops will be borne by the Intern to whom the assets are assigned

4.4 Internet

This policy governs the use of internet by all users in TresVista that are in scope of Information Security Management System (ISMS).

Particulars

- TresVista recognizes the business need for providing internet access to its Interns and it is not to be treated as a basic facility, privilege or right of an Intern
- Interns are eligible to use internet services based on their role and prior approval from their respective Heads of Department/reporting authority



- Formal guidelines are established in order to control and regulate the use of internet in the Organization
- TresVista specifically prohibits Interns from accessing the following type of sites and messenger tools on Company devices:
 - Gambling sites
 - Auction sites
 - Hate sites
 - Pornographic sites
 - Any site engaging in or encouraging illegal activity
 - Hacking sites
 - Social Networking sites (e.g., Orkut, Matrimonial Sites)
 - Messenger tools (e.g., Yahoo Messenger, MSN Messenger, Google Talk)
 - Online shopping sites
 - OTT and entertainment sites
- Access to the internet should not be used for:
 - Viewing, storing, and transmitting indecent, obscene, offensive, sexually explicit materials
 - Upload/download commercial software in violation of its Copyright
 - Unauthorized access to remote systems
 - Attempt to hack internal and external networks
 - Crack passwords of other logins
- All communication to and from the internet is enabled through a firewall to protect the network from being affected by malicious code attack
- Interns must only connect via secured internet sources and avoid connecting to public internet sources (i.e., airport Wi-Fi, lounge Wi-Fi, etc.)
- Remote access to LAN must only be done through secure authentication
- Inbound traffic is checked for malicious code attacks at gateway level
- Users must comply with the Email Policy of the Organization
- All illegal sites and downloads are to be identified and blocked on proxy servers on regular basis
- IT department monitors the internet activity and reports actual and potential security incidents or non-compliance of the policy to the Incident Management Response Team
- Logs of proxy are maintained to reflect user/IP, time of request, request link and files downloaded
- Logs are analysed on a fortnightly basis for forbidden sites and the IT department sends a report to the Head of the Department



- Any breach in this policy results in Disciplinary Action being taken against the Intern. The Disciplinary Action may range from warning letter to Termination with Cause, at the discretion of the Organization

4.5 Email

Email facility is provided to Interns in order to assist them in the performance of their work duties. Email is Subject to regulations covering libel, freedom of information, breach of confidence, Copyright, obscenity, Fraudulent misrepresentation, data protection and wrongful discrimination. Email has legal status as a document and may be accepted as evidence in a court of Law. Access to both, personal and work related emails may be demanded as part of legal action in some circumstances. Some forms of email conduct may also be open to criminal prosecution.

- TresVista emails can be accessible by all Interns using the following applications:
- Microsoft Outlook available from within TresVista premises and on Company-issued laptops
 - Mobile device Management application installed on Interns' compatible personal Smartphones (Android/iOS)

Interns must:

- Not expect privacy, as the IT department and Management may review any emails at any point in time
- Set up out-of-office replies as per their reporting authority's guidance, in case they are out of office for some reason and not able to check emails
- Note that even when it is used for purposes outside the scope of internship engagement of the Intern, TresVista can be held responsible for the contents of email messages, including any attachments
- Not delete emails, including personal messages from the 'Sent Items', 'Inbox' or any other folder
- Not configure their personal mailbox using Outlook or any other applications on Company issued devices such as desktops, laptops, MS Surface, iPads, and smartphones
- Not configure their official TresVista mailbox themselves using any email applications on personal devices such as desktops, laptops, MS Surface, iPads, and smartphones
 - Not try to use webmail to access their official mailbox as it is prohibited and blocked through policy by the IT department

4.6 Telecommunication

Smartphones

It is mandatory for all Interns to have a smartphone with a valid voice and data plan at all possible times. The data plan on an Intern's personal phone must allow at least email communication. Internet browsing is optional.



4.7 Wi-Fi

Apart from the wired LAN, there is a Wi-Fi network in place wherein access to Wi-Fi-enabled devices like a laptop, a tablet PC, or a smartphone can be configured. To seamlessly configure Wi-Fi with restricted internet access on all the Intern's smartphones, it is pushed through Microsoft Intune application which is a secure MDM platform managed centrally by the IT department.

4.8 Social Media

The purpose of this policy is to define guidelines and best practices for Interns concerning the usage of social media.

Overview

While technology enables easy exchange of information, there is also a threat of information leaks, Clients forming unwarranted opinions about certain Employees or Interns.

Scope

Social media includes but is not limited to:

- Social networking websites (e.g., Facebook, LinkedIn)
- Video and photo sharing websites (e.g., Flickr, YouTube)
- Blogs (not including TresVista blogs)
- Micro-blogging (e.g., Twitter)
- Wikis and online collaborations (e.g., Wikipedia)
- Forums, discussion boards, chat rooms and groups (e.g., Google groups)
- Video on Demand (VOD) and Podcasting
- Status updates on messenger services (e.g., WhatsApp, Telegram, Facebook Messenger, or any other instant messaging application)
- Geospatial Tagging (e.g., Foursquare)
- Interviews, columns or talk shows (e.g., Television, print media or radio)

Applicability

This policy is applicable to all Interns.

Particulars

- Interns are not permitted to:
 - Use TresVista's name and refer or state that they are working at TresVista across any social media platforms



- If the Intern wish to update their social media account with details of their current role, they may mention the name of the Organization as 'Financial Services Firm'
- Post any information about TresVista, its internal processes, or any other information which is not publicly available
 - Disclose or publish any information that is confidential or proprietary to TresVista, including but not limited to specific details on projects and Clients
 - Generic references are acceptable (e.g., working with a Middle Eastern PE Firm), however, Intern should be vigilant that no further details are mentioned (e.g., working with the biggest Middle Eastern Non-Sovereign PE Firm)
 - Queries regarding what is considered proprietary and confidential can be discussed with Marketing and Corporate Communications and/or Compliance departments
- Expressly state or imply that they are authorized to speak as a representative of TresVista or give the impression that the views expressed by them are those of the Organization
- Use their official email address or TresVista logo on social media platform, in case it gives the impression that the Organization supports or endorses their personal comments
- Post commentary, content, or images on social media that are defamatory, pornographic, proprietary, harassing, libelous, bullying, discriminatory towards another Intern, Intern or that can create a hostile work environment
- Post anything that may lead to potential infringement of Intellectual Property rights, including but not limited to, brand names, trade names, logos, Copyrights, or trade secrets of TresVista or any of its Clients
- Post or publish any information that could be in contravention of a Law, statute, or regulation applicable in their jurisdiction as well as in the jurisdiction of the Third Party referred to in any such publication
- Engaging in prohibited or unlawful conduct will not be tolerated and the Intern may be Subject to Disciplinary Action
- Tag the Company's official account in any of the posts or comments
- Interns must refrain from engaging in inappropriate posts, including but not limited to threats of violence, dishonorable content such as racial, ethnic, sexual, religious, physical disability slurs, etc.
- Interns should be aware that the Company may observe content and information made available by them on social media platforms
- Interns must refrain from publishing or engaging in rumors that can have a significantly adverse impact on the Company's reputation



- Interns should use their best judgment in posting content that is neither inappropriate nor harmful to the Organization, its Interns, Interns, or Clients
- TresVista reserves the right to request the withdrawal of any posts, comments, or content from any social media platform (including internal platforms). Interns must be aware that some forms of internet conduct may be open to criminal prosecution and lead to Disciplinary Actions

Points to Note:

- Any queries from social media networks, blogs and other types of online content that may generate press, media attention, and/or legal questions must be redirected to Marketing and Corporate Communications department
- Interns are required to adhere to the guidelines mentioned in this policy and the compliance manual, when using social media with reference to the Organization
- Marketing and Corporate Communications department will conduct monthly audits to ensure adherence to this policy
- Non-compliance with the policy, in any form, shall lead to Disciplinary Actions including, but not limited to policy reminders, warning letter, or Termination with Cause, at the discretion of the Company

4.9 Confidentiality Policy

The purpose of this policy is to educate Interns on the protection of Confidential Information of Company, Clients, vendors, etc. received by them during the course of their internship.

Applicability

This policy applies to all Interns of TresVista including full-time, part-time, and Interns, whether permanent or temporary.

Particulars

- To ensure that Confidential Information is well protected, Interns should only disclose information on “need-to-know” basis.
- Interns are not allowed to:
 - Disseminate or provide access of information to unauthorized recipient inside or outside the Company
 - Use information for personal benefit
 - Share or use another Intern’s or Intern's user ID or password to obtain access to the internet, intranet or email
 - Take Confidential Information out of the office
 - Leave Confidential Information/documents unattended or unlocked at the desk or near a printer
 - Replicate information in an unauthorized manner



- Share Client name, project details, etc. while sharing any document for illustration purposes
- Discuss Client-related information in public areas (E.g., Client name, ongoing projects, etc.)
- Additionally, all the Interns must execute a Non-Disclosure Agreement (NDA) and submit it to the HR Operations team (ops@tresvista.com). In case Interns are working out of office premises, they may submit NDA via email as prescribed by the HR Operations team

Compliance

- The Compliance department conducts Internal checks, and verifications as a part of the monthly Internal Audit
- Email surveillance, desk checking, and physical checking (frisking of Interns) also forms a part of the Internal Audit to ensure confidentiality

Non-Compliance

Any non-compliance to the aforementioned policy attracts Disciplinary Actions as defined in the Annexure of this Handbook.

4.10 Data Classification Policy

The purpose of this policy is to provide a framework for classifying data based on the level of sensitivity, value, and its criticality to Company and Clients. Classification of data helps in determining baseline security controls required for the protection of data.

Applicability

This policy applies to all Interns who process, have access to, or store sensitive Client and Company data.

Particulars

This policy has been designed to support policies such as IT security, access controls and confidentiality policies, so that information is protected from unauthorized access, disclosure, use, modification, and deletion. Consistent use of the data classification system facilitates business activities, improves Client confidence, and helps to keep the costs of information security to a minimum

Information

- This data classification policy applies to all information that is in the Company's possession (e.g., Confidential Information from Clients, business Partners, internal information, and others), and protected under this policy
- For the purpose of this policy, the words - data, information, knowledge, and wisdom are used interchangeably

Consistent Protection

- Information must be consistently protected throughout its life cycle, from origination to destruction



- Information must be protected in a manner commensurate with its sensitivity, regardless of where it resides, what form it takes, what technology is used to handle it, and/or what purpose(s) it serves
- Although this policy provides overall guidelines for consistent information protection, Interns are expected to apply and extend these concepts to their day-to-day operations

Data Classification Matrix

- The IT administrator is the owner of the data classification matrix
- A designated data owner is responsible for managing all the data under their purview
- The data classification matrix provides classification on data as well as an overview of the access rights given to Interns

Data Owners

- Data owners are at VP/EVP/SVP and equivalent designations
- Data owners are responsible for abiding by the appropriate sensitivity classifications as defined by the Client
- Data owners do not legally own the information entrusted to their projects
- Data owners are instead designated members of the Company's Management who supervise ways in which certain types of information is used and protected

Personal Data

Personal Data means any information relating to an identified or identifiable natural Person such as name, online identifiers (such as an IP address), mental, economic, cultural, or social identity and location data of that Person

Sensitive Personal Data

Sensitive Personal Data means any information consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sexual orientation, etc.

Classification and Labels

- **Public Information:**
 - Public information is the information that is declared/published for public knowledge by someone with the authority to do so, either for publicity purpose or as a mandatory requirement per the regulation
 - This classification applies to information that is available to the general public and intended for distribution outside the Company
 - This information may be freely disseminated without potential harm (E.g., details shared on the Company website, advertisements, job openings, event announcements, press releases, etc.)



- In case data is not labelled then such data shall also be considered as public data
- **Internal Information**
 - This type of information is meant for circulation within TresVista only
 - It is declared/published by someone in the Organization with the authority to do so
 - This classification applies to all information that is intended to be used by Employees and Interns within the Company. All such data is labelled as internal
 - The unauthorized disclosure, modification or destruction of this information could expose the Company, Interns, or its business Partners to a moderate level of risk. (E.g., Company telephone directory, new Intern training materials, Intern training material, and internal policy manuals)
- **Restricted Information**
 - This type of information should be protected very closely, as it is integral to the success of the Organization
 - This classification applies to sensitive business information that is intended strictly for the use of specified departments, Employees and Interns in the Company. All such data is labelled as restricted
 - Such information is made available on a need-to-know basis within TresVista (E.g., price sensitive information, merger and acquisition documents, corporate level strategic plans, internal projects, litigation strategy memos, etc.)
- **Confidential Information**
 - This type of information could belong to another Company/personnel which has been entrusted to TresVista by that Company/personnel under Non-Disclosure Agreements and other relevant contracts
 - This classification applies to the most sensitive business information that is intended strictly for use by specified departments in the Company and its unauthorized disclosure could adversely impact the Company, Interns, Interns and Clients
 - All Personal and Sensitive Personal Data is treated as Confidential Information and accordingly labelled as confidential. This information is made available only on need-to-know basis within TresVista (e.g., Intern information, Intern information, department specific files, etc.)

Classification and Labelling of Data

- IT administrators in consultation with the data owners appropriately classify data and accordingly mention this information in the data classification matrix
- IT administrator only classifies data based on drive access rights and basis the classification and data details, it is the responsibility of the data owner to further classify and label the data



- The onus is on IT administrators to ensure that data is provided to the specified departments or specified personnel within or outside the Company as the case may be, on the basis of the data classification matrix and the necessary approvals are sought from the data owner

Reclassification of Data

- The classification of data is evaluated to ensure that the assigned classification is still appropriate based on changes to legal and contractual obligations as well as changes in the use of the data or its value to the Company
 - The IT administrator, in consultation with the data owner, conducts this evaluation and accordingly makes the necessary changes to the data classification matrix
- Conducting an assessment on a quarterly basis is encouraged however, the data owners should determine and inform the IT administrator of the appropriate frequency based on the available Resources
- If a data owner determines that the classification of a particular data set has changed, then in consultation with the IT administrator, an analysis of security controls should be performed to determine whether existing controls are consistent with the new classification
- If gaps are found in existing security controls, they are promptly corrected in relation to the level of risk presented by the gaps
- At all times, it is the responsibility of the data owner to label data accordingly

Responsibility of the Recipient

- All Interns who receive confidential, restricted, internal, or public data as defined above are expected to familiarize themselves with this data classification policy and to use these guidelines in their daily business operations
- This document provides a conceptual model of information security for classifying information based on its sensitivity, and an overview of the required approaches to protect information based on these same sensitivity classifications

Compliance

- Data stored on the centralized servers/storage are managed and monitored only by IT administrators
- The Compliance department verifies adherence to this process through various methods, including but not limited to Internal Audits on a periodic basis

Non-Compliance

Any non-compliance with the aforementioned policy attracts Disciplinary Actions as defined in the Annexure of this document.



4.11 Data Privacy Policy

The purpose of this policy is to outline the procedure for Management of incidents, breaches or events that may result in interruption in the daily operations and to ensure that data is stored and maintained regularly and systematically.

Overview

- The policy outlines Management of:
 - Incidents or breaches that may occur inside/outside TresVista premises, including those that involve service users, Interns, Interns, visitors, or vendors
 - Incidents or breaches that have occurred and those that were a 'near miss'
- Interns must treat information of Clients, vendors, stakeholders and other interested parties with the utmost care and confidentiality

Applicability

This policy applies to all Interns as well as any contractors or service providers acting on behalf of TresVista.

Policy

- **Data Privacy Issues:** Data privacy issues can come in many forms, some of which are mentioned below:
 - Loss or theft of papers with information which fall under any data classification category except public information
 - Data posted, emailed or faxed to an incorrect recipient
 - Loss or theft of equipment on which the data is stored
 - Inappropriate dissemination of information
 - Data corruption
 - Unescorted visitors accessing data
 - Non-secure disposal of data
 - Shared Client related information/proprietary data without legitimate reason
 - Compromise on integrity of information
- **Responsibilities:**
 - Interns are required to report all data privacy issues (including potential or suspected incidents or breaches) as soon as possible
 - In the event of a data privacy issue which involves an Intern or another Person within their team and/or area of responsibility, reporting authorities are required to ensure that such issues are reported centrally as outlined under this policy



- The Compliance department has the responsibility to ensure that all data privacy issues are dealt with appropriately
- The Head of Department - Compliance has overall responsibility for ensuring that TresVista complies with this policy
- **Data Privacy Management:**
 - **Reporting**
 - All data privacy related issues should be reported and notified to the Compliance department via email, as soon as Intern become aware of it
 - The reporting email should provide the following information:
 - Description of the data shared
 - Classification of the data shared (to be finalized by the data owner as per data classification policy)
 - Difference between the timeline of reporting and privacy issues
 - Action taken to retrieve data if any
 - Client name if such data pertains to a specific Client
 - All emails that report data privacy issues will be considered as critical
 - The Compliance department ensures that such emails are responded within thirty (30) minutes and resolutions are provided within two (2) hours from when the email was shared on business working days
 - **Business working days:** Monday-Friday between 9:00 AM to 6:00 PM

Investigation and Resolution

- On intimation from Interns, the Compliance department evaluates the situation in consultation with the Head of Department - Compliance and responds to any reported issues after assessing the below mentioned aspects:
 - Assessment of data classification shared
 - Assessment of whether the data was shared inappropriately internally or externally

Data Type	Situation	Privacy Incident	Privacy Breach
Public	NA	NA	NA
Internal	Unauthorized disclosure or access to data transmitted, stored, or processed by	NO	YES



	TresVista with individuals internally		
	Unauthorized disclosure or access to data transmitted, stored, or processed by TresVista with individuals externally	YES	NO
Restricted	Unauthorized disclosure or access to data transmitted, stored, or processed by TresVista with individuals internally and externally	YES	NO
Confidential	Unauthorized disclosure or access to data transmitted, stored, or processed by TresVista with individuals internally and externally	YES	NO

- The issue is notified to the Management in case the privacy breach or incident relates to Client data. SVP of the Client team after consultation with the Head of Department - Compliance and Management shall further notify to the Client as they deem fit
- Log-sheet is maintained to review successful resolution of the data privacy issues reported and to ensure that all the policy breaches and incidents as captured in the logs are recorded and dealt with accordingly
- Learnings and corrective actions of privacy incidents are reported and recorded in the quarterly incident Management meetings
- Suitable actions are taken as per the Consequence Management Process

Escalation Matrix

The email is escalated to the following authorities in case of delay of resolution:

Department	Level one	Level two
Compliance	Compliance department requests.compliance@tresvista.com	SVP, Compliance department nilay.vyas@tresvista.com



Record Maintenance

The record of all the incidents and breaches reported under this policy are maintained by the Compliance department.

Compliance

The Compliance department conducts periodic checks to ensure adherence to the policy.

Non-Compliance

Any non-compliance to the aforementioned policy may attract Disciplinary Actions as defined in the Annexure of this Handbook.

4.12 Incident Management

The purpose of this policy is to define the process of reporting interruptions in the daily operations of the Company due to unplanned events or incidents (e.g., security/data breach, system failure, cybercrimes, presence of suspicious Person in the premises, unattended documents, etc.)

Applicability

This policy applies to all the individuals working with TresVista including full-time Interns, part-time Interns, and Interns.

Particulars

- **Procedure:** This policy outlines the procedure for managing:
 - Incidents that may occur within/outside TresVista premises, including those that involve service users, Interns, Interns, visitors, vendors, etc.
 - Incidents that have occurred and those that are considered a 'near miss'
- **Incident:** Incident is an event, adversely affecting the business operations or becomes a threat to the Company. Some examples of incidents are mentioned below (including but not limited to):
 - System/application failure
 - Unauthorized access to system/networks
 - Cybercrime
 - Loss/theft of mobile handsets
 - Virus attacks
 - Theft and damage to Company's proprietary equipment
 - Documents carried outside office premises without prior approval
 - Misplaced or missing portable media containing Client/Company proprietary data
 - Inadvertently relaying passwords



- Breach of any policy mentioned in the compliance manual

Responsibility

- **Interns:** Interns are required to report all incidents (including potential or suspected incidents) as soon as they become aware of it
- **Reporting Authority:** In the event of an incident involving an Intern, Intern or another Person within their team and/or area of responsibility, reporting authorities are required to ensure that the incident is reported centrally, conduct an investigation where appropriate/necessary, and take an action as outlined under this policy
- **Compliance Department:** The Compliance department has the ultimate responsibility of safety and risk Management within the Company and will ensure that all incidents are dealt with appropriately

Incident Reporting Process

- **Reporting**
 - All the incidents are reported via a Helpdesk Ticket under appropriate category to the respective incident response teams (IT, FMS, HR and Compliance)
 - All Interns should report incidents to their reporting authorities who in turn should raise an incident on the Helpdesk
 - Physical security related incidents, unintentional security breaches and any other policy breaches should be reported to the Compliance department
 - All information security incidents (e.g., system breakdown, intranet portal not working, etc.) should be reported and notified to the IT department
 - All information security breaches (sharing of password, unauthorized access etc.) should be reported and notified to the IT and Compliance departments
 - Interns should observe and report suspected incidents as soon as possible
- **Incident Evaluation/Severity:** Upon receiving intimation from Interns, the incident is evaluated by the incident response team who determines the severity based on the five (5) grades
 - P1 – Critical: Incident that will have significant impact on all Employees, Interns and functioning of business operations
 - P2 – High: Incident that will have impact on a group of users/particular teams/SVPs who are not able to do their job which is time sensitive
 - P3 – Medium: Incident that will have impact on individual Employees or Interns who are not able to do their job which is time sensitive



- P4 – Low: Incident that will have impact on individual users/particular teams who are not able to do their job which is time sensitive
 - P5 – Very Low: Incident that will have no impact on individual user/teams/business
- The severity of an incident is used in determining the priority for resolution
 - **Incident Response/Resolution Time:** All the incidents must be reported and resolved by the concerned teams based on priority mentioned below:

Priority Code	Description	Target Response Time	Target Resolution Time
P1	Critical	15 mins	1 hour
P2	High	1 hour	2 hours
P3	Medium	1 hour	4 hours
P4	Low	2 hours	8 hours
P5	Very Low	3 hours	1 day

- **Priority Determination:** Priority given to an incident determines how quickly it is scheduled for resolution and priority is assigned basis severity of the incident and its impact on the business

Change Priority			Urgency		
			3 - Low	2 - Medium	1 - High
Issue prevents the Interns/Interns from performing a portion of their duties			Issue prevents the Interns/Interns from performing critical time sensitive functions		
			Service or major portion of a service is unavailable		
Impact	3 - Low	No impact on business	P5 –Very Low	P4 – Low	P3 – Medium
	2 -Medium	Multiple personnel in one physical location Degraded service Levels or able to	P4 – Low	P3 – Medium	P2 – High



1 – High	perform only minimum level of service			
	Moderate impact on business			
1 – High	All users of a specific service	P3 – Medium	P2 – High	P1 – Critical
	Personnel from multiple teams are affected			
	Client facing service is unavailable			
	Significant impact on business			

▪ **Incident Investigation and Resolution**

- Respective incident response team must carry out a detailed investigation to identify the cause of the incident and seek suitable resolution based on the investigation
- Once the critical incidents (P1) have been dealt with and closed, the team should notify the Compliance department about the incident resolution
- A root cause analysis of the incident is done and recorded in the incident log on Helpdesk for future references and learning
- A root cause analysis of the incident is done and recorded in the incident log on Helpdesk for future reference and learning
- Log-sheet shall be extracted from the Helpdesk on a quarterly basis to review successful resolution of the incidents within the timelines mentioned in this document and to ensure that all policy breaches captured in the logs are recorded, dealt with accordingly and suitable actions are taken as per the Consequence Management process



Escalation Matrix

The incident is escalated to the following authorities of the respective incident response team in case of any delay in resolving it, basis impact of the said incident.

Department	Level one	Level Two	Level Three
Compliance	Compliance Department requests.compliance@tresvsia.com	Compliance Department nilay.vyas@tresvista.com	NA
IT	IT Department IT@tresvista.com	IT Department abdulbari.ansari@tresvista.com	NA
Human Resources	HR Department compensation2@tresvista.com ops@tresvista.com	HR Department charmi.shah@tresvista.com & shruti.tendulkar@tresvista.com	HR Department faraaz.lodhi@tresvista.com minali.dalal@tresvista.com
Facilities Management Services (FMS)	FMS Department FMS@tresvista.com	FMS Department abdulbari.ansri@tresvista.com	NA

Record Maintenance

- Record of all incidents are maintained by the Compliance department
- Reports showing statistics of incidents resolved/unresolved are presented by the Compliance department to the Management on a quarterly basis, highlighting the critical priority (P1) incidents, key learnings and corrective actions taken

Non-Compliance

Any non-compliance with the aforementioned policy attracts Disciplinary Actions as per the Annexure.

4.13 IT Security Policy

The purpose of this policy is to prevent unauthorized access, ensure the safety and security of TresVista networks, and to protect and to avoid misuse of Client data and other Confidential Information.

Applicability

This policy applies to all Interns.



Particulars

TresVista has adopted access control policies as defined below:

▪ **Data Access Control:**

- Access to each data store is restricted, and the data owner determines access provision and retention requirements
- IT administrators manage and monitor the data stored on the centralized servers/storage
- Regular backups are done to ensure the safety and availability of data
- Antivirus protection software is installed on the endpoints to ensure that the data is protected from virus and malware threats
- Access to all portable media/storage devices is disabled
- Data leak prevention (DLP) controls are implemented across all systems to prevent data leakage
- Interns' access to Company data is limited based on Intern profiles as defined by IT department and the access is automatically enforced

▪ **Network Access Control:**

- Unique Intern IDs and passwords should be used for every Intern to maintain individual accountability of internet, intranet, and e-mail resource usage (Details can be referred to in user ID and password below)
- Access to the network is provided to Interns for the purpose of business operations and made available only from the Intern's Company device with a unique Intern ID
- The provided access does not allow copying of the text or files on any external devices (such as pen drives, USBs, CDs, etc.)
- TresVista has installed a variety of firewalls, proxies, internet address screening programs, and other security systems to prevent unauthorized access and spam and to ensure the safety and security of TresVista networks
- Access to the restricted website, domains and email IDs is provided to Interns for research purposes Subject to them following the whitelisting process, and basis approval from the Head of Department and the Compliance department (Details can be referred to in the whitelisting process clause mentioned below)
- Systems and configurations are strictly monitored and accessed by the Compliance team and IT administrators only

▪ **Systems/Information Access Control:**

- The appropriate level of access to systems and information is determined upon the business need, job functions and role. The respective VPs/EVPs/SVPs (of delivery teams) and SVPs (of non-delivery teams), define the access rights for specific roles, basis which access of information is provided



- For systems containing restricted or personal information, an access control matrix has been developed to record accesses across different roles and departments. The access matrix is updated and maintained regularly to reflect accurate records of access
- Access to specific systems and information is granted to Interns according to the whitelisting process. If approval is granted to use these systems and information, the Intern is required to login using the unique Intern ID and password
- Generic logins are not permitted across TresVista, unless for exceptional circumstances with appropriate monitoring controls
- **User Registration/De-registration Control:**
 - When an Intern joins TresVista, the IT administrator on receipt of information from the HR Operations team, (ops@tresvista.com) hares with the respective VPs/EVPs/SVPs (of delivery teams) and SVPs (of non-delivery teams) or equivalent an access rights checklist based on which the IT administrator creates login IDs and provides assigned access to the Intern's system
 - If the VPs/EVPs/SVPs or equivalent deems it unfit or inappropriate for an Intern to have access to systems and/or information then, the same is communicated immediately to the IT administrator who accordingly alters/removes such access rights. The access matrix is updated to accurately reflect access records
 - If an Intern is on leave for more than one (1) month, the respective VPs/EVPs/SVPs or equivalent informs the IT administrator to alter/remove the Intern's access rights. Such changes are reflected in the access matrix to accurately reflect access records
 - On termination of an internship, the IT administrator backs up the necessary user data which is to be archived and disables the login ID of such Interns
- **Privileged Account Access Control:**
 - Privileged accounts (as compared to regular user account) are system or application accounts that have advanced permissions. Examples of user accounts with privileges include IT administrators, IT reporting authority , SVPs, and Management
 - Privileged rights are given to any other user on request after obtaining the necessary approvals and such privileged access rights are reviewed by the IT administrator on a monthly basis
 - Request for termination of such access rights is communicated to the IT administrator through the Helpdesk a day in advance. Moreover, IT administrator also pro-actively checks with the Interns for continuation/termination of privileged rights during the quarterly review
- **E-mail and Messaging Control:**
 - All email communications to and from TresVista servers are encrypted using the TLS standard



- All email communications (internal/external) are logged into a database and audited at regular intervals, eliminating risk of data leakage
- Spam filtering tools are employed to block spam and other unauthorized messages entering and leaving the Company servers
- Only authorized users are allowed to configure TresVista emails on their smartphones and such emails are provided via Microsoft Intune which prevent emails from being copied or forwarded. The settings for the user can be configured only by the TresVista IT administrator

Folder Access, Domain, Website, and Email Control

All domains, websites, and email IDs that are blocked must be whitelisted and run through the Company firewall using the following processes:

- **For Whitelisting of Websites:**
 - The request is raised through a Ticket, seeking approval from the respective VPs/EVPs/SVPs and the IT Security Team, along with the below details:
 - VPs/EVPs (of RIS teams) and SVPs (of non-RIS teams)
 - Client name
 - Project name
 - Duration
 - Purpose or valid business justification (E.g., research work on social networking)
 - VPs/EVPs/SVPs and the IT Security Team should not approve whitelisting requests unless all the above details have been shared by the requestor
 - The websites can be whitelisted for a maximum period of three months
- **For Whitelisting of Email IDs/Domains:**
 - The request is raised through a Ticket, seeking approval from the respective VPs/EVPs/SVPs and the IT Security Team, along with the below details:
 - VPs/EVPs (of delivery teams) and SVPs (of non-delivery teams)
 - Client name
 - Project name
 - Duration
 - Purpose or valid business justification
 - VPs/EVPs/SVPs and the IT Security Team should not approve whitelisting requests unless all the above details have been shared by the requestor



- The emails ids/domains can be whitelisted for a maximum period of three months. The duration can be extended basis quarterly reviews sent by IT
- **For Whitelisting of Google Drive/Dropbox/ FTP:**
 - The initial request from an Intern for access to a particular Client's google drive/drop box/box is raised through a Ticket, seeking approval from the respective VPs/EVPs/SVPs and the IT Security Team, along with the below details:
 - VPs/EVPs (of delivery teams) and SVPs (of non-delivery teams)
 - Client name
 - Project name
 - Duration
 - Purpose or valid business justification
 - For all subsequent requests for data transfer through the above domains, pertaining to the same Client and user, Ticket should be raised to the IT department with similar details. These requests do not require additional approval from VPs/ EVPs/SVPs or IT Security Team. However, an Intern must ensure that these subsequent requests capture the initial Ticket ID and relevant approvals
 - Access to google drive, drop box and box is provided to Intern through offline sync folder. Only IT administrator can manage accesses on the file sharing platform through web portal
 - Interns must take an acceptance of responsibility from the Client for revoking accesses (Details can be referred in the Annexure)
 - The template is available at W:\TresVista\Compliance\Forms
 - VPs/EVPs/SVPs and the IT Security Team should not approve the whitelisting requests unless all the above details have been provided by the requestor
- **For Folder Access:**
 - The request must be raised through a Ticket, seeking approval from the respective VPs, specifying the path of the folder
 - Authorities reserve the right to ask Intern for any additional information in this regard
 - On receiving approval from VPs/EVPs (of delivery teams) and SVPs (of non-delivery teams), the access is granted to the Interns. However, in exceptional cases approval is given Subject to prior approval of the Director
 - All approvals are routed through the N+1 matrix in case the VPs/EVPs/SVPs are serving their Notice Period

Remote Access Control

- Remote access is provided to Interns to work from other location/home



- To take remote access of the system, Interns are required to connect through SSL/IPsec VPN application provided by the Company
- Remote access is provisioned via two (2) factor authentications
- Necessary host integrity checks shall be configured prior to authorizing remote access to TresVista network
- Remote access from internet cafe is restricted, and Interns should use remote access from their personal devices, or the Company provided laptops, when on business trips
- Activities such as remote file transfer and screenshots are restricted

Wireless Access Control

- Access to wi-fi is provided to all Intern's handset for accessing work emails along with limited access to the internet (Details can be referred to in section 4.13 of this Handbook)
- Security measures like firewalls, DLPs, and web protection software are implemented to prevent access to data files through the wi-fi network
- Wireless connections on mobile devices are terminated on segregated guest network
- Wireless access point is controlled through a centralized Management portal
- Access to restricted websites by illegal means such as proxy applications is prohibited

Operational Software Control

- All applications installed on the operational systems are monitored and controlled as per the IT checklist
- Installation of non-compliant application is strictly prohibited
- If an Intern wants to use an application, not on the checklist, they need to raise a Helpdesk Ticket with the IT department for approval prior to using the program on a system connected to the Company's network

Mobile Devices

- Only the Company's list of supported devices is allowed to connect to the network or access emails
- Devices are presented to the IT department for proper job provisioning and configuration of standard MDM apps, such as emails, browsers, office productivity software and security tools
- In case of remote onboarding, the IT department configures the MDM application remotely
- Emails are configured on mobile devices through the MDM application Microsoft Intune for all Interns except the Management
- Taking screenshots of email and attachment is restricted and controlled through the MDM application
- Attachments are encrypted and can be viewed only in MDM within the device and cannot be exported to an SD card or the device
- Software audit can be conducted at any time to ensure the network security is in operation



- The Intern's device is remotely wiped if:
 - The device is lost
 - The internship is terminated either due to expiry of period or is terminated by either party
 - IT detects a data or policy breach, a virus or similar threat to the security of the Company's data and technology infrastructure
 - Details can be referred to in section 4.16 of this Handbook

Backup

- TresVista follows strict backup procedures for data safety and ensures that industry standards are met
- Off-site backups are done on LTO tapes and on cloud, accessible only to the authorized individuals
- Data backup on cloud and LTO tapes are encrypted using paraphrase key (256-bit encryption)
- Access to backup databases and other data are reviewed annually
- Restoration of data is performed on regular basis to ensure integrity and availability of data backed up on cloud and tapes

User ID and Password

- Intern user IDs and passwords help maintain individual accountability for the internet, intranet and email resource usage. Interns are responsible for all activities on their username/account ID
- Sharing or using another Intern's or Intern's user IDs or passwords to obtain access to the Internet, intranet or email is prohibited
- Interns should select an obscure password and change it frequently, to prevent security breaches
- Five (5) invalid password attempts lock the user's account. The amount of time required to automatically unlock a locked account is ten (10) minutes
- Following password requirements should be complied with:
 - Minimum length – eight (8) characters
 - Maximum length – fourteen (14) characters
 - Minimum complexity - passwords should use four (4) of the following types of characters:
 - Lowercase
 - Uppercase
 - Numbers
 - Special characters such as! @#\$%^&*(){}
- Passwords are case sensitive; the username or the login ID is not case sensitive
- Password history - requires a minimum of four (4) unique passwords before an old password may be reused



- Maximum password age – thirty (30) days
- Minimum password age – two (2) days
- Password-protected screen savers are enabled and protect the computer within ten (10) minutes of user inactivity

Intern Awareness

At TresVista, IT security training is provided to all new Interns as a part of the induction process.

Compliance

- The Compliance department validates the control self-assessment checklist done by IT department on a monthly basis and collects evidence if required
- The Compliance department conducts random end user checks and other necessary periodic audits as and when necessary

Non-Compliance

Any non-compliance to the aforementioned policy attracts Disciplinary Actions as defined in the Annexure of this Handbook.

4.14 Password Management

The purpose of this policy is to ensure that security practices with respect to password-protected information infrastructure are informed to and adhered by all Employees and Interns in the Organization.

Overview

- Users must practice due diligence in controlling access to their systems by protecting their user accounts with passwords that are not easily guessed or deduced
- Passwords are an important aspect of computer security and act as the front-line protection for user accounts
- A poorly chosen password may result in the entire corporate network of TresVista being compromised
- As such, all Interns (including contractors and vendors with access to TresVista's systems) are responsible for taking the appropriate steps, as outlined below, to select and secure their passwords

Particulars

- Password policy ensures that all user accounts are protected by strong passwords and the strength of the password meets the security requirements of the system
- The concept of aging is used for passwords and on their expiry, the passwords cease to function
- Users are educated about password protection and the policy is implemented to ensure that users follow best practices defined in this policy



- For critical information systems, the Account Lockout Strategy is defined basis the risk analysis of the system as well as the costs to be incurred in case such a strategy is implemented
- **Password Standards:** All user and system passwords (including temporary passwords set for new user accounts) must meet the following characteristics:
 - Be at least eight characters in length
 - Consist of a minimum of one character from [A-Z]
 - Consist of a minimum of one character from [a-z]
 - Consist of a minimum of one number from [0-9]
 - Consist of a minimum of one special character [!@%*#?&]
 - Do not use first name and/or last name
 - Do not use last three passwords
 - Should not be simple keyboard patterns
- In addition, users are required to select a new password immediately after their initial login. Passwords must be changed at least every thirty (30) days and previously used passwords should not be re-used

Enforcement

Unauthorized Personnel are not allowed to see or obtain sensitive data. Any Intern found to have violated this policy is Subjected to Disciplinary Action, as determined by the Organization.

4.15 Personal Account Dealing Policy

The purpose of this policy is to detail out procedures for restricting Interns from trading in Personal Accounts using price sensitive information for personal gain/benefit.

Applicability

This policy applies to all Interns of TresVista except those in the following team/departments: ESS, Strategy, FMS, Corporate Finance, Financial Strategy, Human Resources, Compliance, Information Technology, Legal, Procurement, Marketing & Corporate Communications, Training, Software Development, and FMS Support Staff.

Particulars

- **Personal Account Dealing (PA Dealing):** In this policy, each of the following is considered as PA dealing:
 - Trading in securities from a personal trading account (In this policy 'dealing in securities' means an act of subscribing, buying, selling, or agreeing to subscribe, transferring, and transmitting any securities)
 - Dealing in securities by any individual or entity for an Intern's account, or for the account of any of his/her connections or where the Intern or his/her connections benefit



Securities

- Securities have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof and include securities listed in foreign countries except units of mutual fund, cryptocurrencies, donation and rewards which may include following:
 - Shares, Scrips, stocks, Bonds, Debentures, Debenture stock or other marketable securities of a similar nature in or of any incorporated Company or another body corporate
 - Derivatives
 - Units or any other instrument issued by any collective investment scheme to the investors in such schemes
 - Security receipt as defined in clause (zg) of section 2 of the Securitization and Reconstruction of Financial Assets and Enforcement of Security Interest Act, 2002 or any modification thereof
 - Government securities
 - Such other instruments as may be declared by the Central Government to be securities
 - Rights or interest in securities
- However, dealing with a Discretionary Portfolio Management Service (“PMS”) or Pension Plan/ Public Provident Fund where there is no prior relevant communication (direct or indirect) between the portfolio reporting authority and the Intern, or any other Person for whose account the relevant dealing takes place, is not PA dealing
- If an Intern or their connections use the same service provider to provide both such discretionary Portfolio Management services and also to place or execute PA dealing orders, then the Intern should ensure that the service provider keeps separate records for transactions entered under the discretionary Portfolio Management Service and for PA dealing

Connections

- An Intern’s connections are:
 - Dependent Parents including stepmother and stepfather
 - Dependent spouse or another Partner equivalent to a spouse
 - Dependent children, stepchildren, and adopted children
 - Dependent siblings (including stepbrother and sister)
 - Any other Person who is financially dependent on the Intern
- For the purpose of this policy, the definition of ‘dependent’ has the meaning assigned to it under section 80DD of the Income Tax Act, 1961 (43 of 1961)
- An Intern should check with the Compliance department if they are unsure of how to interpret above connections in their case



Disclosure

- Interns must provide the following documents to the Compliance department on Darwinbox:
 - **Initial Holdings Declaration:** Intern need to provide the securities holdings information of the active/dormant/inactive trading account held by them and their connections (Refer Annexure)
 - **Discretionary PMS Declaration:** Interns need to provide the confirmation letter signed by the broker, if applicable for the account held by them and their connections (Refer Annexure)
 - **Foreign Holdings Declaration:** Interns need to provide the foreign securities holdings information, if applicable for the account held by them and their connections (Refer Annexure)
 - **Trading Account Opening/Closing Declaration:** Interns need to notify the Compliance department about the opening/closing of the trading account held by them and their connections by filling Form C under the category of Personal Account Dealing Declarations on Darwinbox within two (2) working days of opening/closing the account, including any trading account opened/closed to deal in foreign securities (Refer Annexure)
- Guidelines and timelines to fill up the above-mentioned documents are available on SharePoint
- It is the responsibility of the Intern to read the guidelines and submit the declarations as per the instructions mentioned therein
- An existing account is a trading account which has already been disclosed in Form A at the time of joining or any subsequent account opened during the Intern's tenure at TresVista which has been disclosed in Form C
- In case an Intern needs an extension to submit the initial holding declaration/annual declaration, they may raise a Ticket with the Compliance department on the Helpdesk in the template provided therein, within the submission deadline
- In case of physical onboarding, new hires must fill in the disclosures on Darwinbox within two (2) working days of completing their compliance training

Holding Period

- Intern should hold securities for a minimum period of thirty (30) days from the last date of purchase
- There shall not be any exceptions to the above-mentioned holding period even in cases of a stop loss order, margin loss, trailing stop orders, or any other methods for limiting losses
- The Compliance department may at any point of time ask for statement of the investments, and Intern are bound to provide the same within the requested timeline
 - In case these statements are not submitted within the timeline specified during the audit, they may face Disciplinary Actions



Role of the Compliance Department

- The Compliance department constantly checks that all the steps mentioned above are followed before and after a trade
- It will verify adherence to this policy through various methods, including but not limited to, monthly Internal Audits, random checks, or any other means as deemed necessary
- The department scrutinizes the following documents:
 - Account statements received from Interns
 - Transaction holding period
 - Disclosures provided by Interns from time to time

Non-Compliance

- Any non-compliance to the aforementioned policy attracts Disciplinary Actions as defined in the Annexure of this Handbook
- Serious offenses such as not holding securities for a minimum period of thirty (30) days from the date of purchase, etc., can be grounds for Termination with Cause

4.16 Personal Device Policy

The purpose of this policy is to prevent unauthorized access, ensure the safety and security of TresVista networks, and to protect and avoid misuse of Client data and other Confidential Information.

Overview

The Personal Device policy has been designed to support policies such as IT security and confidentiality policies, so that information is protected from unauthorized disclosure, use, modification, and deletion as TresVista grants its Intern the privilege of accessing emails on their devices for their convenience.

Applicability

This policy applies to all Interns.

Particulars

Interns at TresVista must agree to the terms and conditions set forth in this policy to use and connect their personal devices to the Company network.



Devices

In this policy, devices mean and include only the Intern's personal smartphones/tablets with android operating system and iOS which are used to install standard MDM apps Microsoft Intune. The Company does not reimburse/cover the cost of the device.

Support

- When an Intern joins the Company, they must present their devices to the IT department for proper job provisioning and configuration of standard MDM apps, such as emails, browsers, and office productivity software & security tools
 - In case of remote onboarding, the IT department configures the MDM application on the Intern's personal device remotely
- IT department does not provide support in case the device has issues with the hardware and operating system
- Interns have their official email ID configured through the MDM application Microsoft Intune only on one device

Security

- Interns must protect their devices by using a password, PIN or any other feature of the device which prevents unauthorized access. To access the Company's network using the device Interns must use their username and a strong password
- The device must lock itself with a password or PIN if it's idle for more than five (5) minutes
- Rooted (android) or jailbroken (iOS) devices are strictly forbidden from accessing the Company's network (Wi-Fi access)
- Devices that are not on the Company's list of supported devices (other than android and iOS) are not allowed to connect to the network
- Interns' access to Company data on their devices is limited based on user profiles defined by IT department and such access is automatically enforced
- The Company reserves the right to disconnect devices or disable services without notification

Responsibility of Device Owner

- The device owner is expected to always use their device in an ethical manner and adhere to the security and support aspects of this policy as outlined above
- If the device needs a remote wipe, the IT department takes necessary precautions to prevent any Personal Data loss and the onus to take additional precautions, such as backing up Personal Data such as contacts, etc. is on the device owner
- In case of theft/loss/damage/change of device, the device owner must follow these guidelines:



- **Theft/Loss:**
 - Report to the IT department within six (6) hours from the time of theft/loss by raising an incident on the Helpdesk
 - Intern can use their personal email ID during non-working hours to report such incidents to IT department at IT@tresvista.com
 - Intern must also notify the mobile carrier immediately upon loss/theft of a device
- **Device Change/Damage:**
 - A request needs to be raised through a Helpdesk Ticket, requesting re-installation of Microsoft Intune
 - Device owner needs to submit old device along with the new device to the IT department for configuration of standard MDM apps, such as emails, browsers, and office productivity software and security tools
 - It is mandatory to submit the old device before getting email configured on the new device
 - In exceptional cases where the Intern is on leave and the old device cannot be submitted, the device owner must seek approval from their respective VPs/EVPs/SVPs (for delivery teams) and SVPs (for non-delivery teams) and the Compliance department for re-installation of Microsoft Intune
 - Once approval is granted the IT department shares the necessary details required to configure email with the device owner
 - However, the device owner must present the new device to the IT department in order to change the email ID password as and when they resume work

Liabilities of the Device Owner

Although this policy provides overall guidance to achieve consistent information protection, the device owners are fully liable for risks including, but not limited to, partial or complete loss of Company and Personal Data due to an operating system crash, errors, bugs, viruses, malware, and/or other software or hardware failures, or programming errors that render the device unusable.

Compliance

- The Compliance department reviews the following on a monthly basis:
 - Adherence to the procedures laid down in the policy above
 - IT reports for re-installation of Microsoft Intune and user emails to IT informing them of theft/loss of device
- The Compliance department also conducts surprise end user checks and other necessary periodic audits as and when necessary



Non-Compliance

Any non-compliance to the aforementioned policy shall attract Disciplinary Actions as defined in the Annexure of this Handbook.

4.17 Physical Security Policy

The purpose of this policy is to define procedures to mitigate the risk of security breaches, to establish the standard privacy control, to enforce applicable Laws and regulations, and create information barriers in the workplace.

Applicability

This policy applies to all Interns.

Particulars

- **Biometric Access:**
 - A biometric system is installed to restrict the access of Interns in the TresVista office premises apart from the basic function of capturing attendance
 - Biometric access logs are stored in an application
 - Access to specific work area is granted based on the role and responsibilities of the personnel
- **Secured Zones:**
 - Secured zones have been defined to restrict access to a specific work area
 - Secured zone access is reviewed quarterly by the respective Head of Department (HoD)
 - A separate secured zones access matrix is maintained, clearly segregating the access type which is to be referred to along with this manual
 - The secured zones access matrix is available on SharePoint
- **Tailgating:** Interns are not allowed to tailgate and should use the biometric system while entering areas wherever access control is applicable
 - Interns are responsible for reporting the presence of any suspicious Person in the TresVista office premises
- **Close Circuit Television System (CCTV):**
 - CCTV cameras are installed at all the entrance/exit points and across restricted areas within the workplace
 - The CCTV systems are reviewed regularly
 - The images/recordings are stored for thirty (30) days on the DVR (Digital Video Recorder) and NVR (Network Video Recorder)
 - The Management may delegate administration of the CCTV system to another Intern, if required
 - Access to view CCTV recordings is limited to the authorized individuals on a need-to-know basis



- The Compliance department will audit such CCTV recordings on a monthly basis and as and when necessary

▪ **Work Area Security:**

- All Interns:
 - Are required to display the ID card at all the times while in the office premises
 - Should ensure that no data either on desktops, laptops, TV screens or hard documents/ files, etc. is captured while clicking pictures or making videos within office premises. While working out of office premises, Interns should ensure they do not click pictures or videos of their desktop/laptops/tablets or any other device displaying TresVista data
 - Are not allowed to carry their personal laptops to the office
- All official print outs should only be taken using the secured print feature
 - To take printouts while working from out of the office premises, Interns need to seek prior approval from their reporting authority and the Compliance department via a Helpdesk Ticket
- Interns are not allowed to carry any Company documents (including notepads) outside the office premises. In exceptional cases, if required, an Intern shall be allowed to take documents Subject to approval per the below matrix:

Documents	Approval (Via Helpdesk)	Authority
Carrying documents outside office premises	Prior approval	Reporting authority Compliance department (Authorities reserve the right to ask Intern for details of project, etc.)

▪ **Bag Checks:**

- Bag checks are conducted periodically to prevent unauthorized movement of official documents outside office premises
- All official Client related print outs are taken on colored papers by default for easy identification and differentiation of work documents from personal documents
- Non delivery teams having access to white paper printers are Subject to bag checks for all documents including white papers
- All official information should only be recorded on notepads provided by TresVista or which have the TresVista logo printed for easy identification and differentiation of work documents from personal documents. In case



notepads which are not provided by TresVista, or do not have the TresVista logo are found with official information during bag checks, it is considered as a violation of this policy and Interns may face Disciplinary Action

- All documents (including notepads) received as a part of training, or which have the TresVista logo printed should be carried outside the office premises only with prior approval by raising a Helpdesk Ticket. If such documents are found during the bag checks without approval, it will be considered as a violation of this policy and shall attract necessary Disciplinary Action
 - Personal documents can only be printed from the printers in the terminals/kiosks. If personal documents are printed on colored papers without prior approval and this is detected during a bag check, it will be considered as a violation of this policy and shall attract Disciplinary Action

▪ **Desk Security:**

All Interns must ensure that:

- All documents are kept in locked drawers (including, but not limited to Client related documents, backup documents, analysis, information received from Clients and any other material marked as confidential)
- The drawer keys should not be kept unattended
- Any paper should not be left unattended on the desks
- Printouts should not be left unattended near the printer. Such unattended printouts are shredded within ten (10) minutes from the time of printout, without any intimation
- Any other unattended documents at the desks are shredded daily at 7:00 AM IST

Compliance

- The Compliance department conducts periodic checks on the following:
 - Desk security
 - Shredding of unattended documents
 - ID cards
 - Tailgating
 - Visitor's and vendor's register and visitor's pass file
 - Bag checks and frisking of Inters (female Interns are frisked by another nominated female Interns only)
 - Number of visitor/vendor IDs available at the reception against the number of IDs issued to the security
- The department will also be conducting periodic Internal Audits, surprise checks, or any other checks as to ensure adherence to the policy



Non-Compliance

Any non-compliance to the aforementioned policy attracts Disciplinary Actions as defined in the Annexure of this Handbook.

4.18 Policy for Material Non-public information

The purpose of this policy is to ensure that any Confidential Information about the Company, Clients, etc. received by Interns during the course of their internship is protected, and to define guidelines in order to ensure compliance with Laws governing:

- Trading in securities while in the possession of "material Non-public information"(MNPI) about any Company or any of its subsidiaries, and
- Disclosing MNPI to outsiders ("Tipping")

Objective

- Set out procedures to restrict Interns from trading in Personal Accounts using MNPI for personal gain/benefit
- Educate Interns about MNPI, Tipping and promote TresVista's ongoing commitment to compliance with all applicable insider trading Laws
- Assist Interns in meeting their responsibilities in terms of complying with these Laws and internal policies

Scope

This policy applies to:

- All Interns of TresVista
- All transactions in securities of a Client Company, MNPI of which the Interns has obtained during the course of their internship with TresVista

Definitions

- **Material Information:**
 - Any information about the Client Company that a reasonable investor would consider important in the decision to buy, hold, or sell securities of the Client Company is considered as Material Information
 - In simple terms, Material Information is any type of information that could reasonably be expected to affect the price of Client Company securities, regardless of whether the information is positive or negative
 - E.g.: Information regarding future earnings or losses; changes in dividend policies; declaration of a dividend; any pending or proposed merger; acquisition or tender offer; a significant sale of assets or sale of a subsidiary; significant Management changes; labor negotiations; the offering of additional securities; information about the Company's capital structure, including liquidity or other financial metrics; unusual



gains or losses in major operations; major marketing changes; the gain or loss of a substantial customer or supplier; significant new Products or discoveries

▪ **Non-public information:**

- Any information about the Client Company that has not been publicly disclosed is considered as Non-public information
- Information ceases to be non-public when it has been broadly disclosed and investors in the Client Company's securities have had sufficient time to assimilate and react to it
- The circulation of rumors, even if accurate, widespread, and reported in the media, does not constitute public disclosure. Similarly, only disclosing part of the information also does not constitute public dissemination
- To this policy, TresVista considers information as generally be considered public i.e., information about the Client Company has ceased to be non-public after the second business day following the date on which the Client Company has disclosed such information to the public
- Generally, the Client Company discloses this Non-public information by filing annual, quarterly, current, or other reports and communications with the Securities and Exchange Commission

- **Tipping:** For this policy, Tipping is defined as passing or providing access of MNPI about a Client Company by the Intern to any individual who does not have a confidential relationship with the Client Company or have a valid reason to be in possession of such information

Standards of Business Conduct

- TresVista seeks to comply with federal securities Laws and regulations applicable to its business and Interns who have access to Confidential Information are not permitted to use or share that information for the purpose of trading securities or any other purpose except to conduct regular business operations
- Interns should share information on a need-to-know basis
- If an Intern possesses any material, Non-public information about the Client, they are not permitted to trade, (i.e., buy or sell) in any securities of the Client Company or engage in any action that takes advantage of such MNPI until such information ceases to be non-public
- No Intern should tip off or disclose MNPI about any Client Company, or give trading advice of any kind to anyone while in the possession of MNPI
- All the Interns must execute a Non-Disclosure Agreement (NDA) at the time of joining TresVista to protect the material, Non-public information about the Company, Clients, etc. received by Interns during the term of their internship
- If Interns are sent or receive access to any material, Non-public information concerning the Client, they should ensure that this information is kept confidential and immediately inform the Compliance department about it



- Questions regarding whether the information is “confidential,” “material” or what restrictions exist on the use or distribution of such information should be directed to the Compliance department
- In addition to this policy, Interns are also required to adhere to the applicable policies /clauses detailed out in the Compliance Manual and the Intern Handbook

Treatment of MNPI

- Guidelines and procedures which form a part of this policy and the Compliance Manual limit the flow of MNPI from one team/department or area to another
- TresVista creates an information barrier (i.e., a chinese wall) to further limit the flow of MNPI from one area to another (e.g.: Client specific captives for teams managing MNPI)
 - The information barrier safeguards and restricts the flow of MNPI and prohibits anyone in an “inside” area from communicating MNPI to anyone in an “outside” area, unless approved by the Compliance department
 - The Compliance department monitors the flow of information within inside areas at regular intervals
- If a team/department is functioning in a business area that is not within the information barriers, and any MNPI is received, the responsibility is of the VP/EVP of that team/department to reach out to the Compliance department immediately
 - The Compliance department then relocates the team/department to an information barrier till the time the project is concluded
- If a team/department is in possession of MNPI which may lead to a potential conflict of interest for another Client, it is the responsibility of the SVP of that team/department to reach out to the Compliance department immediately

Inadvertent Disclosure

- The Compliance department is responsible for the administration of this MNPI Policy
- If any Intern becomes aware that MNPI is inadvertently disclosed by another Intern, Intern, officer, etc., to a Person outside the Company who is not obligated to keep this information confidential, they must be immediately report this to the Compliance department so that appropriate remedial action can be taken

Compliance

- The Compliance department conducts internal checks, and verifications as a part of Internal Audit. It verifies adherence to this policy through various methods, including but not limited to, random checks or any other means as deemed necessary
- Once the Compliance department receives information from the relevant team/department about the receipt of MNPI, it takes necessary steps to prevent unauthorized flow of MNPI
- Compliance department also scrutinizes the:



- Account statements received from Employees and Interns
- Transaction holding period to ensure that no trades have been carried out by Employees or Interns who are in possession of MNPI
- Disclosures provided by Interns from time to time

Non-Compliance

- Any non-compliance of the policy leads to Disciplinary Actions
- Serious offenses such as theft of MNPI, illegal disclosure of sensitive data, etc., are considered for immediate Termination with Cause and may also involve legal consequences, at the discretion of the Company
- Non-compliance of this policy could also result in both civil and criminal penalties, including fines and jail sentences even for the Person who trades based upon a tip
- Interns also incurs penalties for such violations by Tipping information to others, even if the Intern has not personally gained any profit from the other Person's actions

4.19 Social Media (Corporate Accounts)

The purpose of this policy is to define guidelines for usage of corporate social media accounts on networking sites including but not limited to professional websites such as LinkedIn, for business purposes as required by TresVista.

Scope

This policy applies to Interns who are designated and eligible to use specific social media platforms for business purposes, per Company requirements, and the roles and responsibilities defined in accordance to their internship.

Particulars

- **Personal Accounts**
 - Interns using Personal Accounts are not permitted to engage in any conversation with TresVista's potential prospects, current Clients, or third parties through any social media platform
 - Interns are only allowed to communicate with them through MS Outlook and MS Teams for conversations concerning business operations
 - Interns are not permitted to send a request to any potential prospects, current Clients, or third parties on social media platforms unless they receive instructions from the Organization or the potential prospects, current Clients, or third parties, to do so
 - In case of violation of this restriction, it would be termed as a material breach of the internship terms and shall be a ground for immediate Termination with Cause, as per the terms defined in section 7.2 of this Handbook



- Interns are not permitted to use TresVista’s name and refer or state that they are working at TresVista across any social media platforms
 - If the Interns wish to update their social media account with details of their current role, they may mention the name of the Employer as ‘Financial Services Firm’
- Interns are not allowed to expressly state or imply that they are authorized to speak as a representative of TresVista or give the impression that the views expressed by them are those of the Organization
- Interns are not permitted use their official email address or TresVista logo on social media platform, in case it gives the impression that the Organization supports or endorses their personal comments
- In any given scenario, Interns are required to adhere to the guidelines laid down in the social media policy and maintain high standard of ethical and professional conduct, and performance while interacting with any Clients or Third Party on behalf of TresVista
- Any behavior or collective action which harms or could harm the integrity and/or interests of TresVista must be avoided. Any unethical or illegal behavior will be reported to the Ethics Committee and will be considered as a breach of the internship and the Intern will be liable for Disciplinary Actions, at the discretion of the Company
- During the term of internship and thereafter, the Intern shall not circumvent TresVista, take no actions to the detriment of TresVista and refrain from communicating or conducting business, in whatsoever manner, with TresVista’s prospects, Clients, or contacts, either directly or through other representatives, without prior written consent from the Organization
- The Intern declares to have read and understood the content mentioned hereinabove and agrees to abide by the terms. In the event of any breach of any of the covenants set forth hereinabove, TresVista shall reserve its rights to initiate appropriate actions against the Intern



5. Leaves and Holidays

The purpose of the section is to provide information on the types of leaves and Holidays that can be availed during a leave cycle, the eligibility criteria, and the relevant application process via the 'Leave and Flexwork' module on DarwinBox

5.1 Firm-wide Holidays

This section provides information on Firm-wide Holidays decided per the list of government Holidays in the given year.

Eligibility

All Interns are eligible for the designated Firm-wide Holidays.

Particulars

- Firm-wide Holidays consist of public Holidays, and/or other religious events and festivals
- A list of ten to eleven (10-11) Firm-wide Holidays decided as per the list of government Holidays will be provided depending upon the Intern's office location
- There is no application procedure for these Holidays, and they are auto-applicable to all Interns

5.2 Personal Days

Personal Days are unplanned leaves that do not require prior approval of the reporting authority, as these leaves are provided to accommodate for any unplanned/unforeseen personal emergencies and sickness.

Eligibility

All Interns are entitled to Personal Days Subject to it being mentioned in their internship agreement, from their date of joining.

Particulars

- Interns may refer to their internship agreement for the number of personal leaves allotted to them for the entire duration of their internship
- **It should be noted that:**
 - The entire leave balance is made available to the Interns from their date of joining
 - More than two consecutive Personal Days for any reason other than sickness can be deemed as Vacation Days
 - In case of sickness, the Interns can take more than two Personal Days at the discretion of the reporting authority



- If an Intern's Personal Days are exhausted, the Vacation Days can be utilized with the prior approval of the reporting authority
- When on leave, Interns may be expected to attend conference calls or respond to emails that may be critical to the nature of work
- When on leave, Interns should set up a formalized out-of-office response for all internal or external emails and MS teams messages received in their absence to help notify the sender of their unavailability and inform them of an alternate point of contact (Refer to Organizational Hygiene policy under the header of people policies of this handbook)
- All leave requests applied on the system are auto approved as per the timeline shared by the Corporate Finance department
 - In case the reporting authority disagrees with the auto-approved leaves, they have the option to reject these leaves on the system and should inform the Intern of the same
- If Interns miss marking their leaves within the monthly timeline defined by the Corporate Finance department, these days are auto deducted from their Vacation Days balance. In the absence of sufficient Vacation Days balance, these days are marked as unpaid leaves. The process in this regard is defined below:
 - Interns are eligible to receive 75% of their stipend for these days in the next month's payment cycle Subject to reporting authority's approval, however, a standard 25% deduction for each day, is applicable
 - To receive this amount Interns must share reporting authority's approval with the Corporate Finance department within the monthly attendance/leaves timeline and also mark this day from their Personal Day balance, as applicable
 - If Interns do not have any leave balance (vacation/Personal Days), this day is treated as an unpaid leave and the necessary deductions apply to the stipend payable

Procedure for Application

- A Personal Day does not need prior approval from the reporting authority
- However, the Intern should inform the reporting authority as soon as they are aware that they require a Personal Day
- The Intern must record this leave under 'Personal Days' on Darwinbox and the leave request then goes to the authority for acceptance or rejection

5.3 Vacation Days

Vacation Days are planned leaves that require prior approval of the reporting authority and should ideally be planned at least two (2) weeks in advance.



Eligibility

All Interns are entitled to Vacation Days Subject to it being mentioned in their internship agreement, from their date of joining.

Particulars

- Interns may refer to their internship agreement for the number of leaves allocated for the entire duration of their internship
- It should be noted that:
 - Vacation Days are approved at the discretion of the reporting authority
 - The entire leave balance is made available to the Intern from their date of joining
 - Interns are advised not to take leaves for more than five (5) consecutive working days at a given time
 - If an Intern's Vacation Days are exhausted, they cannot be substituted with Personal Days
 - When on leave, Interns may be expected to attend conference calls or respond to emails that may be critical to the nature of work
 - When on leave, Interns should set up a formalized out-of-office response for all internal or external emails and MS teams messages received in their absence to help notify the sender of their unavailability and inform them of an alternate point of contact (Refer to Organizational Hygiene policy under the header of people policies of this handbook)
 - =Leave requests may be denied by the reporting authorities if there are Client demands/critical deliverables or capacity constraints
 - If the reporting authority requires an Intern to cancel or reschedule a vacation that has already been approved (not applicable for auto-approved leaves), any expenses that may be incurred in cancelling or rescheduling, that are not covered by the Intern's travel insurance, are reimbursed. This reimbursement is expensed to the respective department budget on producing relevant receipts. A vacation can be cancelled only in the most urgent situations
 - Exceeding Vacation Days balance incurs a loss of pay and is deducted from that month's stipend
 - At the point of exit, an Intern is required to repay TresVista for any Vacation Days taken in excess of the leave entitlement and it is adjusted with the final payment of the stipend
 - Vacation Days cannot be availed if the Intern is on notice and will be terminating/completing their internship



- If Interns miss marking their leaves within the monthly timeline defined by the Corporate Finance department, these days are auto deducted from their Vacation Days balance. In the absence of sufficient Vacation Days balance, these days are marked as unpaid leaves. The process in this regard is defined below:
 - Interns are eligible to receive 75% of their stipend for these days in the next month's stipend payment cycle Subject to reporting authority's approval, however, a standard 25% deduction for each day, is applicable
 - To receive this amount Interns must share reporting authority's approval with the Corporate Finance department within the monthly attendance/leaves timeline and also mark this day from their Vacation Day balance, as applicable
 - If Interns do not have any leave balance (vacation/Personal Days), this day is treated as an unpaid leave and the necessary deductions apply to the stipend payable

Procedure for Application

- In order to avail of a Vacation Day, an Intern must apply for it under 'Vacation Days' on Darwinbox
- When a leave is requested on the system, it should include all days like weekends and/or firmwide Holidays if they fall under the duration of the vacation
 - Although these days would not be counted, it would indicate that the Intern is unavailable to come to work on those days
- **It should be noted that:**
 - Interns are encouraged to discuss with their reporting authorities and then plan their vacations. This is to ensure that the deliverables/capacity is managed effectively and in a timely manner
 - If the date of application is more than one (1) month before the start date of the leave, and the reporting authority neither approves nor rejects it until one week prior to the start of the leave, then the leave is deemed to be approved
 - If the date of application is within one (1) month before the start date of the leave, and the reporting authority neither approves nor rejects it until one week prior to the start of the leave, then the leave is deemed as rejected
 - In such instances, the Interns should revoke these leaves on Darwinbox within the timeline shared by the Corporate Finance department. Failure to do so, leads to a deduction from the Intern's leave balance
 - If the Intern does not revoke the leaves, the reporting authority has access to reject them on Darwinbox
 - An Intern can raise a concern with the Ethics Committee if they feel they were denied Vacation Days unfairly. The Ethics Committee investigates the situation through conversations with the reporting authority and the Intern, and finalizes the status of the application per the process mentioned under the 'Code of Ethics' section



- All leave requests applied on the system are auto approved as per the timeline shared by the Corporate Finance department
 - In case the reporting authority disagrees with the auto-approved leaves, they have the option to reject these leaves on the system keeping the Intern informed of the same

5.4 Unpaid Leaves

Eligibility

This policy is applicable to all Interns.

Particulars

- Interns cannot avail of unpaid leaves while they have an active leave balance (vacation/Personal Days)
- Once the leave balance is exhausted, Interns may avail of unpaid leaves

Points to Note

- It is recommended that Interns only avail of unpaid leaves in case of health/unforeseen emergencies or Personal commitments
- Interns are advised to plan their leaves accordingly, if they are aware that they will need additional leaves during a specific time of the year
- Interns should inform their reporting authorities as soon as they are aware that they will require these leaves

6. Compensation and Benefits

TresVista aims to provide to its Interns, compensation that is fair, motivating, and that aptly rewards them for their contribution towards TresVista's success. Any compensation provided to an Intern by TresVista is confidential.

6.1 Reimbursements

The purpose of this policy is to defined guidelines for reimbursing the expenses incurred by Interns when working late, on weekends, or firmwide Holidays from the office.

Eligibility

This policy is applicable to all Interns Subject to prior approval of the reporting authority.

Particulars

Reimbursements are paid out with the stipend per the timeline defined by the Corporate Finance department. Intern may claim the following types of reimbursements:



- **Conveyance:** Intern can reimburse one way travel expenses (Through any mode transport such as private vehicle, Uber, Ola, etc.) to their residence if they work beyond 9:00 PM on regular workdays. If Interns work on weekends or firmwide Holidays, conveyance expenses to and from their residence are reimbursable. Conveyance reimbursements are paid for distance up to 30 kilometers and expenses for distance beyond this limit must be borne by the Intern. The documentation to avail of these expenses is as follows:
 - **Public Transport:** Receipts should be provided wherever available
 - **Personal Vehicles:** Interns who travel by their personal vehicles can claim reimbursement for fuel. In order to claim this, Interns must map the distance from the office to their residence and record it on Darwinbox prior to reimbursing the amount. The reimbursement rates are re-evaluated at fixed intervals throughout the year. The prevailing fuel reimbursement rate can be referred in the Annexure
 - **Toll:** If the Intern uses a road toll, then any expense in relation to the usage of the toll must be entered as a separate conveyance entry on Microsoft Dynamics 365
- **Food:**
 - **Dinner Allowance:** If an Intern works beyond 9:00 PM, dinner expenses are reimbursed per the prevailing reimbursement limits mentioned in the Annexure
 - **Lunch Allowance:** If an Intern works on weekends and/or Firmwide Holidays, lunch expenses are reimbursed per the prevailing reimbursement limits mentioned in the Annexure
 - **Business Promotion:** Interns may reimburse any reasonable expense incurred while entertaining a Client. If the Client is visiting the office, the team may email an authorized Intern from the FMS department for meal arrangements
 - **Other Reimbursements:** This includes attire, driver allowance, fuel, and mobile/internet allowance

Procedure to Claim Reimbursements

When claiming reimbursements, Interns must be mindful of the following:

- Make entries for food and/or conveyance reimbursements on Microsoft Dynamics 365 on a daily basis
 - If any Intern is in office on 29th and orders dinner, but the food arrives at 12:30 AM on 30th, the reimbursement entry should still be dated as 29th
 - Reimbursement bills are not paid if they are submitted under a different name, any of the details are incorrect or the entry on Microsoft Dynamics 365 is under the incorrect expense head
- All reimbursement bills should have GST details
- Entries must be approved by reporting authority within the defined monthly timeline
 - Unapproved expenses are not reimbursed



- All receipts should be shared in electronic format with the Corporate Finance department within the defined monthly timeline, no reimbursements are paid out without corresponding receipts despite being approved by the reporting authority
- Reimbursement should be marked as billable by the reporting authority in instances where they are billed to the Client
- Client and project must be entered correctly (especially in case of cross department work)

Points to Note

- The reimbursement allowance amounts are mentioned in the Annexure
- Below mentioned documentation is not considered for monthly reimbursements:
 - Email copy with order confirmation details
 - Any modifications to a printed bill (e.g., Adding/overwriting)
 - Cash/credit memo
- The responsibility of putting the entries on the system, getting them approved and sharing the necessary receipts is on the Intern. No entries, approvals, and/or receipts are accepted after the defined reimbursement timeline determined by the Corporate Finance department
- Any reimbursement entries with incorrect details (e.g., wrong date or amount) are not reimbursed at the discretion of the Corporate Finance department
- Any expense incurred by Interns on Company account (including but not limited to car service) and not submitted for reimbursements per the process defined above are treated as a personal expense and deducted from the Intern's stipend
- Interns that miss claiming any type of reimbursements within the timeline defined by the Corporate Finance department, are eligible to receive this amount in the next stipend cycle, with a standard 25% deduction, at reporting authority's approval
 - Interns should share reporting authority's approval with the Corporate Finance department within the monthly reimbursement timeline in order to receive this amount

Re-Billable Reimbursements

Interns claiming any reimbursements which are re-billable to the Client should properly mark it as re-billable on the system. If Interns/reporting authority fail to mark it as re-billable, it is considered as a policy breach and the above-defined consequence matrix is applicable.



6.2 Tax Compliance

During the term of internship with the Company, any tax liability arising in respect of the exercise of the internship or on stipend earned by the Intern would be borne solely by the Intern and the Company will only be responsible for withholding taxes from any amounts paid to the Intern and payment thereof to the credit of the Central Government in accordance with the provisions of the Income Tax Act, 1961 and rules made thereunder.

The investment declaration template for the current year will be available on SharePoint. It will consist of:

- **Investment Declaration Form:** Every Intern needs to fill an investment declaration form at the beginning of a financial year in order to get tax reliefs. This form will provide a snapshot of all the investments that the Intern proposes to undertake during the financial year. The form should be filled and a hard/scanned copy duly signed should be submitted as per the deadline as notified by the Corporate Finance department. Tax deductions will be made from an Intern's monthly stipend as per this investment declaration
- **Submission of Proofs:** 'Tax Notes' sheet under investment declaration includes information about the documents/ proofs that need to be submitted under every investment component in order to avail of tax benefits. It also consists of some guidelines that Interns should keep in mind while submitting their investment proofs. An Intern will be required to submit all the necessary proofs of the investment to the Corporate Finance department as per the deadline as notified by them. In case, an Intern is unable to produce, or fails to submit the required receipts and documents, a lump sum to the extent of the total tax payable will be deducted from the Intern's stipend
- Form 16, a document that assists an Intern in the process of filing Tax Returns, will be available after May. A Ticket may be raised on Helpdesk to the Corporate Finance department to avail this form



7. Exit

TresVista aims to provide a smooth and consistent process for its exiting Interns.

7.1 Notice Period

- Internship can be terminated by either party by abiding by the Notice Period in accordance with the terms of the internship agreement
- The Intern's Notice Period does not officially begin until they formally raise a Separation request via DarwinBox. The HR Operations team (ops@tresvista.com) subsequently confirms the Last Working Day on the portal and this is communicated to the Intern and their reporting authority via an automated email
- **It should be noted that:**
 - The Intern's reporting authority approves the Separation request on DarwinBox. In case the resignation is not acted upon within the defined TAT of 5 days, the resignation will be auto approved by the system which will be treated as the final approval for HR Operations team to proceed with the Separation formalities
 - It is mandatory for all Interns to serve the Notice Period, per the terms of their internship agreement, unless notified otherwise by the Company
 - In case an Intern does not serve the Notice Period, as approved by reporting authority per the Notice Period waive off clause (mentioned below), their exit formalities (including but not limited to their internship completion certificate, etc.) is not processed
 - The relieving formalities of all exiting Interns are conducted on their Last Working Day; except for the Interns who have been terminated. If the applicable Last Working Day is a Holiday, then the formalities are conducted on the preceding working day
 - Interns cannot avail of any paid leave or flexwork, excluding those mentioned below, during their Notice period. In case Interns need to avail of leaves, these leaves will be unpaid in nature and may result in an extension to the Notice period, at the Reporting Authority's discretion
 - Any pre-approved/system auto-generated leaves on DarwinBox falling in the duration of the intern's notice period will be revoked
 - Interns are required to work from the office per the hybrid guidelines while serving their Notice Period and should mandatorily work from office on their Last Working Day. The detailed hybrid guidelines can be referred to in section 3.2 of this Handbook
 - The reporting authority, at their discretion, can reduce an Intern's Notice Period up to one (1) month. This one-month reduction can be waived off, bought out, or can be a combination of both. In case Interns want to reduce their Notice Period beyond one (1) month, they must mandatorily make a payment in lieu of the Notice Period



i.e., buy-out. Please note, any reduction of notice is not an Intern's entitlement, and falls under Company's discretion

- The raised/approved Separation can be withdrawn by the Intern any time before the Last Working Day at the reporting authority's discretion
- If an Intern is a part of any disciplinary proceedings, the Company reserves the right to reject their Separation request, at its sole discretion

7.2 Termination with Cause

Termination with Cause includes but is not limited to the following grounds:

- Material failure to observe the performance standards set by the Intern's reporting authority or in carrying out their duties
- Unsatisfactory performance during training period
- Failure or inability to provide any undertakings as may be reasonably requested in accordance with policies, procedures and rules on the conduct that the Company expects from its Interns within a reasonable period of time or any censure or fining by the relevant regulatory authority
- Misconduct as identified by the Interns' reporting authority
- Negligence in connection with or affecting the business of the Company or any associated Company
- Willful disobey of a lawful or reasonable order by an Intern
- Interns found guilty of Fraud or dishonesty
- Serious or persistent breach or non-observance of any of the Company's policies, terms and conditions as mentioned in the Intern Handbook or the Internship agreement (as amended from time to time)
- Taking unpaid days off for medical or any other reasons in excess of a tolerable amount as determined in the internship agreement
- Taking any bribes or improper gifts/kickbacks
- Any action or behavior that creates a potentially unsafe working environment
- Conduct which is likely to bring the Company, Management or reporting authority into disrepute or conviction of a criminal offence
- Refusal to submit to a drug test or failure in any drug test administered by an institution or named physician selected by the Company
- Information given by the Interns in connection with their personal details, education and/or their past service is found to be untrue



- An Intern being actively involved in any other business or income generating venture, without prior approval from reporting authority or the Conflict of Interest Committee
- Any prior regulatory fine or censure, litigation, crime, or involuntary termination of any prior internship or internship affecting the Intern, or any report from the Company's background checking agency that comes to the Company's notice and the Company considers unsatisfactory
- Sexual harassment of a woman in the workplace in accordance with 2.7 of this Handbook
- Any physical or mental incapacitation, which (in the Company's sole opinion) renders an Intern incapable of performing their duties associated with their internship
- In the event the Company is not satisfied with the results of any background checks, the Company reserves the right to terminate the Intern's internship with immediate effect without any liability or loss to the Company

7.3 Absconding Interns

- In case the Intern does not report to work by 9:30 AM, then the reporting authority or the VP tries to contact the Intern on their personal contact number
- If the Intern is unavailable/does not answer the calls, the reporting authority sends an email to the Intern
- In case the Intern does not respond to any of the above, the reporting authority gets in touch with the Intern's emergency contact Person's number saved on DarwinBox and inform the HR Operations team (ops@tresvista.com) about the case
- In case the Intern does not report to office/remains unreachable due to an unforeseen event (accident, hospitalization, death etc.) then the reporting authority informs the HR Operations team to take the process forward
- In case no response is received from the Intern/Intern's emergency contact within twenty-four (24) hours, the HR Operations team intervenes and proceeds with the next steps
- Post seven (7) days from the date of the Intern's absence, the internship contract may be, upon Company's discretion, immediately terminated

7.4 Exit Formalities

All exiting Interns must complete a set of formalities prior to their Last Working Day before they can be relieved from their internship.

Exit Checklist

- Exit clearances are triggered on the Interns Last Working Day through DarwinBox. These clearances comprise of a list of formalities that need to be completed when Intern leaves the Organization. The clearances, with the required sign-offs from the concerned stakeholders, must be completed on DarwinBox



- Interns must return all Company property including, but not limited to, any Company equipment, storage devices, training manuals, keys, documents, correspondence, records, credit cards, and passes which are in their possession or under their control. They must sign the resource return form (as applicable) on their Last Working Day

Final Payment of Stipend

- Final Payment of Stipend includes but is not limited to stipend, refunds, deductions, etc.
- **Stipend Withholding:**
 - **For Interns with One Month's Notice Period:** Stipend is withheld from the day the separation is raised on DarwinBox until their last working day and is paid out as part of final payment stipend per the timeline defined by the Corporate Finance department
 - **For Interns with Two or More Months' Notice Period:**
 - Stipend for the month in which Interns raise their separation on DarwinBox, is withheld. This stipend is paid out as part of final settlement per the timeline defined by the Corporate Finance department
 - Stipend for the any other month falling during the notice period is paid as per the monthly salary timeline as defined by the Corporate Finance department
- Any amount that is due to the Company may be deducted from the Intern's final stipend payment

No Due Certificate

All Interns are required to submit their Intern sign-off on DarwinBox, on their Last Working Day. Exit formalities (including but not limited to their internship completion certificate, stipend payments etc.) are not processed for Interns who fail or refuse to adhere to the obligations.

Internship Completion Certificate

- Once the exit checklist is closed and relevant exit formalities are completed, an internship completion certificate is issued within 30 working days. It contains details such as the Intern's name, date of joining, Separation Date/Last Working Day, college name etc.
- It should be noted that the internship completion certificate will not be shared if the internship tenure (*as per offer letter*) is not completed
- In the event of Termination with Cause, a termination letter is issued explicitly stating that the internship was terminated for cause



8. Glossary

1. **Account Lockout Strategy:** A method to restrict user's account after a defined number of failed password attempts and to prevent the user from logging onto the network for a certain period of time
2. **Accrual:** The accumulation or increase of something over time, especially payments or benefits
3. **Aggrieved Woman:** A woman who alleges that she has been Subject to sexual harassment at the workplace
4. **Alleged Perpetrator:** One against whom allegations of sexual harassment have been made
5. **Bonds:** Investment securities where an investor lends money to the Company for a set period of time, in exchange for regular interest payments
6. **Client:** Persons or entities to which the Company has sold any Products or for which the Company has performed any services
7. **Collateral:** Any canvas or space (digital or offline) that acts as the background for the TresVista brand, trademark, name, tagline and/or logo to be incorporated along with any associated branding element of TresVista, such as committee or club logos/names, department and function names, and organizational information
8. **Commercialize:** Manage or exploit in a way designed to make a profit
9. **Commissioning Mother:** A biological mother who uses her egg to create an embryo implanted in any other woman
10. **Company/Organization/Firm/Employer:** TresVista and its subsidiaries and affiliates as below under "TresVista"
11. **Competitor:** Competitor shall include any and all Person who competes with the business of the Company or its Clients, where a potential/actual disclosure of Confidential Information to such Person can be detrimental to the interests of Company and/or its Clients
12. **Confidential Information:**
 - All Company and Third Party information which is proprietary and not available to the general public and shall include but not be limited to plans, Client lists, budgets, funds and investments, Products in development, portfolio Management strategies, tools and procedures, finance issues, marketing strategies, personnel records, information technology, board and executive structures and methods of conducting meetings
 - Knowledge, technical data, trade secrets, confidential commercial information relating to the business finances or affairs of the Company or Third Party
 - Inventions accessed, created, received, exploited, developed or obtained by the Intern during the course of internship with the Company
 - Any information, data and materials of whatever nature, whether or not stored in any medium and/or disclosed orally or in writing by the Company, its affiliates, agents, Partners, suppliers, Clients, contractors and consultants including, but not limited to, information about equipment, software, designs, samples or technology, trade



secrets, commercially sensitive information, business plans, Personal Data (including Sensitive Personal Data), technical documentation, business information, Product or service specifications or strategies, marketing plans, pricing information, financial information, information relating to existing, previous and potential customers, contracts and Products, Inventions, unreleased software applications, methodologies and other Know-how, drawings, photographs, models, mock-ups, and design and performance specifications, production volumes, and production schedules, together with any notes, summaries, reports, analyses, or other material derived or developed by the Company or you, in whole or in part

- Any documents or information, which reflect or are generated from any such Confidential Information, will also be deemed as Confidential Information
- All Confidential Information shall be deemed as the Company's trade secrets

- 13. Copyright:** The exclusive and assignable legal right, given to the originator for a fixed number of years, to print, publish, perform, film, or record a given material
- 14. Corporate Accounts:** Any social media account procured and paid for by TresVista for the purpose of business activities and requirements
- 15. Contractual Interns:** The Interns retained by a Company for a predetermined time and remuneration
- 16. Debenture:** A marketable security that the Company can issue to obtain long-term financing without needing to put up Collateral or dilute the equity
- 17. Declaration Register:** Register kept at the reception across all office locations for TresVista's female Interns to sign in case they exit the office premises post the legally mandated timelines, as applicable for each location and choose not to opt for the Company-provided transportation service
- 18. Dependent Parents:** Any legal guardians, or legally verifiable mother and father, whether biological or otherwise, of an Intern who are emotionally, physically or financially dependent on the Intern for the purpose of their subsistence. For the purpose of this Handbook, Dependent Parents shall not include in-law relatives of an Intern
- 19. Developments:** Any idea, Invention, design, technical or business innovation, computer program and related documentation, or any other work Product developed, conceived, or used by the Intern, Intern, in whole or in part that arises during internship with the Company, or that are otherwise made through the use of the Company's time or materials
- 20. Disciplinary Action:** This indicates any action that can be taken on the completion of investigation proceedings including but not limited to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter
- 21. Employee:** All individuals who are directly employed by Tresvista, including but not limited to those who are on probation, Notice Period, etc. in accordance with the terms of their respective employment agreements



22. FMS Support Staff: Employees on TresVista's payroll, hired for facility Management and operations

23. Fraud: Any concern raised by written communication that discloses or demonstrates information that may act as evidence for unethical or improper activity. This term applies to both internal and external Fraud and is used to describe offenses including, but not limited to, deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts, collusion perpetrated for personal profit or to gain some unfair advantage. It further includes the following:

- Intentional, false representation or concealment of a material fact to induce another to act upon it to his or her injury
- False accounting: Dishonestly destroying, defacing, concealing, or falsifying any account, record, or document required for any accounting purpose
- Knowingly providing false, deceptive, misleading, or incomplete information within business/functions, to its Partners, or other business relations, or deliberately failing to provide information where there is an obligation to do so
- Disclosing confidential, sensitive, or proprietary information to internal or external parties
- Forgery of any document, cheque, bank draft, or any other financial document or account that belongs to TresVista
- Alteration, destruction, or removal of any document, cheque, bank draft, or any other financial document or account that belongs to TresVista, unless instructed to do so by the Organization
- Misappropriation of funds, securities, or misuse or destruction or removal of supplies, or other assets of TresVista including computers, vehicles, machines, mobiles, furniture and fixtures, equipment, or any other property, or services outside of professional duties or without specific authorization
- Impropriety in the handling or reporting of money or financial transactions
- Making unfair profits due to insider knowledge of Company activities
- Accepting or seeking any offering that may influence the action of any Person such as taking inducements, gifts, anything of material value or favours from contractors, vendors, or Persons providing services/ materials to TresVista. For the approval matrix refer to the Gift policy defined in section 3.11 of this Handbook
- Any similar or related inappropriate conduct

24. Geospatial Tagging: The process of adding geographical identification metadata to various media such as a geotagged photograph or video, websites, SMS messages, QR Codes or RSS feeds and is a form of geospatial metadata

25. Handbook: This entire document which lays down the policies and processes applicable to an Intern during the entire duration of the internship



- 26. Holiday:** Firm-wide Holidays, or day offs as declared by the Firm
- 27. HR Department:** All Interns in the human resource teams at TresVista
- 28. Information Security Management System:** A set of policies and procedures to manage information security risks in a structured and systematic way to protect confidential, personal, and sensitive data from being compromised
- 29. Intellectual Property:** Intellectual Property means and includes creations and/or information, whether registered or unregistered and/or pending registration of trademarks, Patents, designs, Copyrights including design Copyrights, Inventions, service marks, internet domain names, processes, geographical indications, computer software, Confidential Information, Know-how and any research effort relating to any of the above mentioned business, names whether capable of registration or not, moral rights and any similar rights in any country in the world
- 30. Intern:** An individual working as a trainee with the Company in order to gain work experience and enhance his/her skills
- 31. Internship letter:** the document which offers the position of Intern to an individual
- 32. Internal Audit:** An independent service to evaluate the Company's internal controls, its corporate practices, processes, and methods
- 33. Inventions:**
- Developments, Know-how and Intellectual Property, which an Intern may solely or jointly conceive or develop or reduce to practice, or cause to be conceived or developed or reduced to practice
 - Invention means and includes whether registered or unregistered and/or pending registration of neighbouring rights, trade secrets, integrated circuits, exploitation of any present or future technologies, applications for any of the foregoing and the right to apply for them in any part of the world; discoveries, creations, Inventions, modifications or improvements upon or in addition to an existing invention
- 34. Know-how:** Any or all information (including that comprised in or derived from information technology of all sectors, electronic Intellectual Property, manuals, instructions, catalogues, booklets, data disks, tapes, source codes, formula cards and flowcharts) relating to the business of the Company and the Products or services and markets therefore, Clients of the Company (including, but not limited to, Clients with whom the Intern may have become acquainted with during the term of their internship), software, Developments, Inventions, processes, formulas, technology, designs, drawings, engineering, hardware configuration information, marketing, finances or other business information, services provided or Products manufactured and developed by the Company
- 35. KPI:** Key Performance Indicator



- 36. Law:** All applicable Laws, byelaws, rules, regulations, orders, ordinances, protocols, codes, guidelines, policies, notices, directions, judgments, decrees or other requirements or official directive of any governmental authority or Person acting under the authority of any governmental authority and/ or of any statutory authority in India
- 37. Leave Balance:** Total number of leaves allotted to the Intern
- 38. Male Representative:** A resource appointed to accompany TresVista's female Interns in case they exit the office premises post the legally mandated timelines, as applicable for each office location, and choose to opt for the Company-provided transportation service under the Travel and Security Policy
- 39. Management:** The managing directors, and any other authorized Intern of TresVista
- 40. Material Information:** Any information about the Client Company that a reasonable investor would consider important in the decision to buy, hold, or sell securities of the Client Company is considered as Material Information
- 41. Non-Disclosure Agreement (NDA):** A legally binding contract between the Company and the Intern that prevents sensitive information from being shared with unauthorized personnel
- 42. Non-public information:** Any information about the Client Company that has not been publicly disclosed is considered as Non-public information
- 43. Notice Period:** The party who is terminating internship will give to the other advance notice in writing, with such notice not to be less than the period indicated in the internship letter or as specified in subsequent promotion letters
- 44. Opportunity:**
- Any Prospective Client; or
 - Any private equity or private debt or asset backed security, or structured finance or real estate Opportunity which is offered to or under consideration by any Intern of the Company for the Company or any Person for which the Company provides advisory, consultancy or Management services
- 45. Partner:** Partners include but are not limited to vendors, Clients, campuses, CSR Partners, institutions and any third parties who are not affiliates of TresVista or the TresVista group of companies
- 46. Patent:** A government authority or license conferring a right or title for a set period, especially the sole right to exclude others from making, using, or selling an invention
- 47. Perpetrator:** One against whom allegations of sexual harassment have been proved, based on the Inquiry conducted by the IC
- 48. Person:** An individual, Firm, limited partnership, limited liability partnership, Company, association, corporation or other Organization
- 49. Personal Account:** Any social media account created by Intern for their personal use



- 50. Personal Data:** Personal Data means any information relating to an identified or identifiable natural Person such as name, online identifiers (such as an IP address), mental, economic, cultural or social identity and location data of that Person
- 51. Personal Day:** A day that an Intern is not present in the office as stated in the section 5.2 of this Handbook
- 52. Podcasting:** The practice of using the internet to make digital recordings of broadcasts available for downloading to a computer or mobile device
- 53. Product:** Any financial services related work including but not limited to valuation, investment research; industry landscaping, due diligence, financial modelling, investment recommendations, consulting, portfolio Management, capital raising, and M&A advisory services, or any other work the Company performs for its Clients
- 54. Prospective Client:** Persons to which the Company has:
- Maintained or established contact or other information regarding that Person for the purpose of soliciting or potentially soliciting the sale of any Products
 - Solicited for the purpose of selling any Products within the last two (2) years preceding the time of determination as to whether a Person is a Prospective Client for the purpose of this policy
- 55. Prospective Joiner:** People who are most likely join the Company in the near future
- 56. Requisition:** An official order laying claim to the use of property or materials
- 57. Resources:** Including but not limited to Company property (tangible or intangible) such as IT facilities, stationery, printing facilities, emails, databases/software, conference rooms, recreation room, pantry, training manuals, fax machines, manpower, etc., whether owned by TresVista or not provided to or used by Employees for the performance of their responsibilities at TresVista
- 58. RIS:** Research and Investment Services department is divided into smaller teams
- 59. Royalty:** A sum paid to a patentee for the use of a Patent or to an author or composer for each copy
- 60. Scrip:** A certificate entitling the holder to acquire possession of certain portions of public land
- 61. Separation:** It is a process under which an Intern formally notifies their decision to separate from the Firm. The process is managed through DarwinBox
- 62. Separation Date /Last Working Day:** Last Working Day of the Intern as approved and notified by the HR Operations team
- 63. Sensitive Personal Data:** Sensitive Personal Data means any information consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural Person's sexual orientation, etc.
- 64. SharePoint:** A common site through which all Interns can access information including but not limited to TresVista Handbooks, templates, policies, training manuals, Organization chart, etc.



- 65. SPOC:** Single point of contact
- 66. Subject:** This means a Person or group of Persons against or in relation to whom Fraud is reported or evidence is gathered during an investigation under this policy
- 67. Tailgating:** A physical act of security breach in which an Intern enters/leaves the office premises or secured zones without using biometric access
- 68. Third Party:** An individual or an entity who is directly/indirectly involved in an existing business relationship between two parties, of which one is TresVista
- 69. Third-Party Resources:** Resources hired by TresVista's sub-contractor
- 70. Termination with Cause:** Termination of internship without any notice considering the grounds mentioned in the section 7.2 of this Handbook
- 71. Termination Date:** The date on which the termination of an Intern's internship with the Company becomes effective and, for the avoidance of doubt not the date on which notice of termination is given
- 72. Ticket:** A mode of communication used to raise requests/incidents via the 'Helpdesk Support' module on Microsoft Dynamics 365
- 73. Tipping:** Passing or providing access of Material Non-public information about a Client Company by the Intern to any individual who does not have a confidential relationship with the Client Company or have a valid reason to be in possession of such information
- 74. TresVista:** TresVista Financial Services Pte. Ltd., TresVista Financial Services Pvt Ltd, TresVista Analytics LLP, TresVista INC, and TresVista UK Ltd. along with their affiliates are collectively referred to as "TresVista"
- 75. TresVista Branding:** Any branding material, trademark, tagline, logo/name owned by TresVista (whether registered or not) or presence of TresVista on any offline or digital Collateral whether inside or outside the office space
- 76. Vacation Day:** A day that an Intern is not present in the office as stated in the section 5.3 of this Handbook
- 77. Video on Demand (VOD):** Technology for delivering video content, such as movies and television shows, directly to individual customers for immediate viewing
- 78. Whistle Officer:** This means an officer who is appointed to conduct a detailed investigation of the disclosure received from the whistle-blower and recommend Disciplinary Action



9. Annexures

Business Travel - Domestic: Allowance Limits

Particulars	Amount
Travel ⁽¹⁾	INR 11,500
Stay ⁽²⁾	INR 7,000
Food ⁽³⁾	INR 2,000
Domestic Conveyance	INR 3,000
Host Allowance	INR 3,750
Client Welfare	Actuals

1) Cost on return fare basis

2) Includes accommodation cost per night

3) Food and conveyance cost refers to per day allowance

4) All reimbursements will be based on actuals Subject to the limits mentioned above

Reimbursements: Allowance Limits

#	Particulars	Last Updated	Amount
1	Public Transport	August 01, 2024	INR 600
1	Fuel		
	Car	August 01, 2024	INR 18.0
	Bike	August 01, 2024	INR 7.0
2	Food		
	Lunch	August 01, 2024	INR 450.0
	Dinner	August 01, 2024	INR 450.0

Consequence Management Process

Any non-compliance with the requisite practice/process will attract Disciplinary Actions as specified in the Consequence Matrix:



A. Physical Security Policy - Nominal

Breach	Breach1	Breach2	Breach3	Breach4	Breach5 & Above
Tailgating	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact - INR 2000/-	1) Intern - Monetary Impact - INR 4000/- 2) Reporting Authority- Monetary Impact - INR 1000/-	1) Intern - Monetary Impact - INR 8000/- 2) Reporting Authority- Monetary Impact - INR 2000/-
Failing to display ID cards	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact - INR 2000/-	1) Intern - Monetary Impact - INR 4000/- 2) Reporting Authority- Monetary Impact - INR 1000/-	1) Intern - Monetary Impact - INR 8000/- 2) Reporting Authority- Monetary Impact - INR 2000/-
Carrying personal documents outside in colored paper without approval	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact - INR 2000/-	1) Intern - Monetary Impact - INR 4000/- 2) Reporting Authority- Monetary Impact - INR 1000/-	1) Intern - Monetary Impact - INR 8000/- 2) Reporting Authority- Monetary Impact - INR 2000/-
Drawer keys unattended / Drawers unlocked	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact - INR 2000/-	1) Intern - Monetary Impact - INR 4000/- 2) Reporting Authority- Monetary Impact - INR 1000/-	1) Intern - Monetary Impact - INR 8000/- 2) Reporting Authority- Monetary Impact - INR 2000/-



Computer unlocked	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact - INR 2000/-	1) Intern - Monetary Impact - INR 4000/- 2) Reporting Authority- Monetary Impact - INR 1000/-	1) Intern - Monetary Impact - INR 8000/- 2) Reporting Authority- Monetary Impact - INR 2000/-
Clicking Pictures in office premises	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact - INR 2000/-	1) Intern - Monetary Impact - INR 4000/- 2) Reporting Authority- Monetary Impact - INR 1000/-	1) Intern - Monetary Impact - INR 8000/- 2) Reporting Authority- Monetary Impact - INR 2000/-
Documents unattended at desk & Printer	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact-INR 2000/-	1) Intern - Monetary Impact - INR 4000/- 2) Reporting Authority- Monetary Impact - INR 1000/-	1) Intern - Monetary Impact - INR 8000/- 2) Reporting Authority- Monetary Impact - INR 2000/-
Visitor unattended	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact-INR 2000/-	1) Intern - Monetary Impact - INR 4000/- 2) Reporting Authority- Monetary Impact - INR 1000/-	1) Intern - Monetary Impact - INR 8000/- 2) Reporting Authority- Monetary Impact - INR 2000/-



B. Physical Security Policy - Severe

Breach	Breach 1	Breach 2
Carrying Client document outside office premises without approval	Warning Letter	Termination
Carrying documents with TresVista logo outside office premises without approval	Warning Letter	Termination
Carrying Company assets outside office location	Warning Letter	Termination
Intern bringing their laptop without prior approval	Warning Letter	Termination

C. Confidentiality Policy - Severe

Breach	Breach 1	Breach 2
Discussing/sharing Client related information/any Company proprietary data outside the Organization without legitimate reason	Warning Letter	Termination
Use of TresVista/Client information for personal benefit	Warning Letter	Termination
Discussing/sharing Client related information/ Illustration with individuals internal to the Organization without legitimate reason	Warning Letter	Termination
Sharing user ID password of Client Portal/tools with unauthorized Intern/Intern	Warning Letter	Termination
Sharing user ID password	Warning Letter	Termination



D. Personal Account Dealing Policy - Nominal

Breach	Breach1	Breach2	Breach3	Breach4	Breach5 & Above
Submitting the forms, A, B and D within 2 days post completion of Compliance training	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact - INR 2000/-	1) Intern - Monetary Impact - INR 4000/- 2) Reporting Authority- Monetary Impact - INR 1000/-	1) Intern - Monetary Impact - INR 8000/- 2) Reporting Authority- Monetary Impact - INR 2000/-
Non submission of trading statement within 10 working days post completion of compliance training	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact - INR 2000/-	1) Intern - Monetary Impact - INR 4000/- 2) Reporting Authority- Monetary Impact - INR 1000/-	1) Intern - Monetary Impact - INR 8000/- 2) Reporting Authority- Monetary Impact - INR 2000/-
Submitting the FORM C Once opening/closing the current Demat account	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact - INR 2000/-	1) Intern - Monetary Impact - INR 4000/- 2) Reporting Authority- Monetary Impact - INR 1000/-	1) Intern - Monetary Impact - INR 8000/- 2) Reporting Authority- Monetary Impact - INR 2000/-

E. Personal Account Dealing Policy - Severe (1)

Breach	Breach 1	Breach 2
Unauthorized /Unapproved Pre-clearance trade	Warning Letter	Termination
Violating 30 days/ Not holding shares for 30days	Warning Letter	Termination



New hire not moving their Demat account within 15days of DOJ	Warning Letter	Termination
Existing Intern not moving their Demat account within 30 days	Warning Letter	Termination

(1) Applicable once trade monitoring system software is in place and the dedicated broker program is started

F. Gift Policy - Severe

Breaches	Breach 1	Breach 2
Accepting gift from business associates within the Firm	Warning Letter	Termination
Accepting gift from Vendors/Outsiders for personal benefit	Warning Letter	Termination
Accepting gift from Client above the threshold	Warning Letter	Termination

G. IT Security, Acceptable Usage & Personal Device Policy - Nominal

Breach	Breach1	Breach2	Breach3	Breach4	Breach5 & above
Damage of Company asset	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact - INR 2000/-	1) Intern - Monetary Impact - INR 4000/- 2) Reporting Authority- Monetary Impact - INR 1000/-	1) Intern - Monetary Impact - INR 8000/- 2) Reporting Authority- Monetary Impact - INR 2000/-
Falling prey to phishing attack	Policy Reminder	Monetary Impact - INR 1000/-	Monetary Impact - INR 2000/-	1) Intern - Monetary Impact - INR 4000/-	1) Intern - Monetary Impact - INR 8000/-



2) Reporting Authority	–	2) Reporting Authority
Monetary Impact – INR 1000/-		Monetary Impact – INR 2000/-

H. IT Security, Acceptable Usage & Personal Device Policy - Severe

Breaches	Breach 1	Breach 2
Download/Using password of Microsoft Intune in unauthorized device	Warning Letter	Termination
Clicking screenshot of TresVista/Client data	Warning Letter	Termination
Communicating of TresVista/Client data over WhatsApp etc.	Warning Letter	Termination
Use of Privilege access for non-business purpose/personal benefit	Warning Letter	Termination
Intern accessing the folder, domain, website and emails which is unauthorized	Warning Letter	Termination
Falling prey to phishing attack via communication e.g.: Office landline, telephone call etc.	Warning Letter	Termination

I. Incident & Data Privacy Policy - Severe

Breaches	Breach 1	Breach 2
Privacy breach Data type - Internal - Data within TresVista	Warning Letter	Termination
Privacy Incident Restricted and Confidential - Data within TresVista	Warning Letter	Termination



Privacy Incident Internal, Restricted and Confidential - Data outside TresVista	Warning Letter	Termination
Intern not reporting incidents as soon as they are aware	Warning Letter	Termination

Personal Account Dealing Declarations

FORM – A: INITIAL HOLDING DECLARATION

Department:

Name:

Designation:

In submitting this declaration, I affirm that:

- (a) I have read and understood the Personal Account Dealing Policy of the Company
- (b) I agree to be bound by the Personal Accounts Dealing Policy so long as I remain an Intern of the Company
- (c) At present, I am/ my connections deal in securities as defined in the Personal Accounts Dealing Policy and are operating _____ (mention number) trading account(s).

At present, I am/ my connections do not deal in securities as defined in the Personal Accounts Dealing Policy

Following are the details of the account(s):

Beneficiary Name	Client ID / Customer Account Number	Bank / Broker Name	DP ID

Declaration:

I hereby Confirm that, all the information given by me is true and correct and I undertake to notify you immediately of any change in the above facts. I also confirm my understanding that I may be Subject to Disciplinary Action, up to and including termination of my internship, for any false or tampered submission.

Place:

Date:



FORM – B: DISCRETIONARY PMS DECLARATION

Department:

Name:

Designation:

I, hereby declare that vide agreement dated _____, I maintain my portfolio under Discretionary PMS with _____ (Name of Firm). I hereby further declare that all the trading activities undertaken in the said account are solely done by Mr. /Ms. _____ (name) and I do not have any involvement in the investment decision(s).

Declaration:

I hereby confirm that, all the information given by me is true and correct and I undertake to notify you immediately of any change in the above facts. I also confirm my understanding that I may be Subject to Disciplinary Action, up to and including termination of my internship, for any false or tampered submission.

Place:

Date:

FORM – C: TRADING ACCOUNT OPENING/CLOSING DECLARATION

Department:

Name:

Designation:

I _____ (Name), hereby declare that I have / my connections have opened/closed the below mentioned trading account (s).

Beneficiary Name	Client ID / Customer Account Number Opened/Closed	Bank / Broker Name	Trading Account Opening / Closing Date

Declaration:



I hereby confirm that, all the information given by me is true and correct and I undertake to notify you immediately of any change in the above facts. I also confirm my understanding that I may be Subject to Disciplinary Action, up to and including termination of my internship, for any false or tampered submission.

Place:

Date:

FORM – D: FOREIGN HOLDING DECLARATION

(Note: Please strike off wherever not applicable)

I ----- (Name), hereby declare that:

- (a) I have read and understood the Personal Account Dealing Policy of the Company
- (b) I agree to be bound by the Personal Accounts Dealing Policy so long as I remain an Intern of the Company and
- (c) At present, I am/ my connections are operating _____ (mention number) trading account(s).

Following are the details of the said account(s):

Beneficiary Name	
Trading Account Number	
Bank / Broker Name	
Bank / Broker Code	

Beneficiary Name	
Trading Account Number	
Bank / Broker Name	
Bank / Broker Code	

(If more than two trading accounts are operational, please provide above details in separate sheet)

Encl: Statement of declaration submitted with RBI

In submitting this declaration, I affirm that the information disclosed above is complete, accurate and to the best of my knowledge not misleading.

Signature:

Designation:

Date:

