



**Employee Code of Conduct Policy**

Networked Elements of Security and Trust Ltd.

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**(NEST)**

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## **Employee Code of Conduct Policy**

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### **1. Purpose**

**1.1** The purpose of “Employee Code of Conduct” Policy has been created to help you understand our core values and the behaviors expected to support them. It provides guidance and support for every NEST employee with high standards of ethical behavior and compliance with local laws and regulations being essential to protecting the reputation and long-term success of our business.

**1.2** NEST is committed to ethical business practices, sustainability, and social responsibility. Our policy outlines the standards and expectations we have for our suppliers and vendor partners.

### **2. Scope**

**2.1** This Code of Conduct is the first resource for knowing how best to fulfill the responsibility to understand and follow our core values. Our values – professional, excellence, empathy, enthusiastic, diversity, impact oriented, innovative and integrity – describe who we are and what we do to achieve our mission. The Code of Conduct applies to every employee of NEST regardless of the title, stature or tenure. Every person, upon joining the organization and annually thereafter, must confirm in writing that he or she has reviewed the Code of Conduct, and understands and agrees to it.

### **3. Policy Elements**

**3.1** NEST employees are bound by their contract to follow the Employee Code of Conduct while performing their duties.

**3.2** The components of the Code of Conduct are:

### **4. Comply with this Code of Conduct**

**4.1** Everyone at all levels of NEST has an obligation to know and follow this Code of Conduct including:

- All members of the NEST Board of Directors.
- All employees and officers of the NEST.

**4.2** In addition to governing conduct by employees, this Code governs conduct between employees and customers, competitors, and the numerous business providers (including suppliers, service providers, vendors, contractors, and agents) who assist NEST every day. Because we want our business providers, customers, and investors to understand how we do business and what they can expect of us.



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### 5. Whistleblowing and non-retaliation

5.1 NEST is committed to addressing potential violations and protecting its partners and employees against retaliation for reporting concerns. Procedures have been set out on how suspicions or allegations of aid diversion, fraud, money laundering or counter-terrorism finance can be reported.

5.2 As a NEST employee:

- I will report in good faith any concerns in connection with NEST's operations and potential violations of this Code, laws, regulations, or ethical standards to the following whistleblowing hotlines that provide for anonymous reporting and are available 24/7:

by Send an email to [nestbd.care@gmail.com](mailto:nestbd.care@gmail.com) or [nestcare@nestbd.net](mailto:nestcare@nestbd.net)

or call the free hotline number +8801847102700.

or anonymously through the web portal: [www.nestbd.net](http://www.nestbd.net).

### 6. Conflict of Interest

6.1 Employees are expected to remain loyal to NEST and avoid conflicts of interest. Generally, a conflict of interest occurs when a personal or family interest interferes with our ability to perform our jobs effectively and objectively. Any situation that might put us in such a position or create the appearance of bias should be avoided.

**6.2 Our Responsibility:** All conflicts of interest, including potential conflicts of interest, must be disclosed to concern manager. He/she must comply with this Code as well as any local conflict of interest policies that apply to his/her role, which may be more restrictive than this policy.

6.2.1 In avoiding conflicts of interest, he/she must comply with the following principles:

- Do not hold a financial interest in or accept employment from an entity doing business with NEST. It would or could conflict with the performance of your duties at NEST.
- Do not take any business-related action for your personal benefit.
- Do not use NEST equipment and resources for personal use.
- Protect Company assets as if they were your own.
- Do not take for yourself any opportunities that are discovered or advanced using your position with NEST.



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- No family member should report directly to another family member.
- Do not facilitate a conflict with one of our suppliers, service providers, customers, or any government official.

**6.3 Disclosing and Addressing Potential Conflicts of Interest:** NEST requires that you disclose, in writing, any personal, business, or other relationship that might constitute a conflict of interest or could potentially create a conflict of interest.

**6.3.1** Below we have listed certain activities and interests that present conflicts of interest or potential conflicts of interest that would have to be disclosed. This list is not exhaustive, and you must also disclose any other personal interests that may give rise to a conflict of interest. Because it is impossible to describe every possible conflict of interest, NEST relies on your good judgment to seek advice when appropriate and to adhere to high ethical standards in the conduct of your professional and personal affairs.

### **6.3.2 Financial Conflicts of Interest**

- Having a financial or management interest (as an employee, officer, or director) in any customer, supplier, service provider, competitor, or any enterprise that you know or reasonably believe has or may have a business relationship with NEST.
- Engaging in business with, or as a customer, service provider, or supplier of, NEST, other than in the ordinary course, as an employee or a public consumer.
- Competing with NEST.
- Maintaining concurrent employment with NEST and with any other organization.

### **6.3.3 Personal Relationships with Parties in Company Related Transactions:**

- **FAMILY MEMBERS:** Members of your immediate family (your spouse, domestic partner, minor children) or, to your knowledge, your adult children, parents, or siblings are employed by NEST, a customer, supplier, service provider, or competitor of NEST. If you disclose this type of conflict of interest, you should also report any later change in the reported relationship that puts you in a greater position to influence or be influenced by your relative's employment.
- Arranging or facilitating any business transaction between any of your relatives and NEST between any of your relatives and any customer, supplier, service provider, or competitor of NEST.

### **6.3.4 Gifts, Fees, or Other Personal Benefits:**

- Accepting fees, commissions, or any other personal benefit from any person or



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business involved in any business with NEST.

- Offering or supplying entertainment, meals, transportation, gifts, or other favors to any person in a business relationship with NEST, other than what is reasonable for the individuals involved and the business at hand.
- Soliciting or accepting money (or cash equivalents such as gift cards) for your personal benefit in any amount from a current or potential customer, supplier, service provider, or competitor of NEST.

### 7. Safety

7.1 Safety is one of our core values at Reliance and that includes providing a safe and secure work environment. Maintaining a safe working environment is of the utmost importance and is everyone's responsibility.

7.2 Employees responsibilities:

- All employees must familiarize themselves and comply with NEST's posted safety rules and directives.
- Do not undertake work you are not qualified to perform.
- Observe all safety rules and procedures when operating machinery and equipment.
- Always wear NEST-approved personal protective equipment (PPE) whenever required.
- Immediately report workplace accidents, injuries, illnesses, and unsafe conditions to your supervisor to ensure prompt medical attention (if necessary), help prevent future incidents, and ensure timely regulatory reporting (if required).
- Report all non-work-related injuries and illnesses that may affect the safe performance of your job prior to performing any work.
- Communicate our safety and health requirements to anyone coming on to NEST property, including visitors, customers, suppliers, service providers, workers, and contractors.

### 8. Anti-harassment and Abuse

8.1 NEST is committed to providing an environment recognized for its equality and diversity and treats everyone with fairness, respect, and dignity. We do not tolerate any discrimination against employees or others affected by our operations. As a NEST employee:

- I will conform with equal opportunity policies in all aspects of my work, from recruitment, work performance to interpersonal relations.
- I will contribute to a working environment characterized by mutual respect,



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dignity, and non-discrimination.

- I will contribute to a working environment free from harassment and abuse, especially relating to race, religion, color, ethnicity, age, gender, or sexual orientation.
- I will not engage in relationships or behavior that are exploitative or abusive, whether physical or verbal, that disrupts others' work performance or creates a hostile work environment.
- I will not engage in any form of sexual abuse or exploitation of any persons of any age.
- I will report any such behavior or malpractice in the workplace by others through established confidential reporting systems.

### **9. Anti-Bribery and Anti-Corruption**

**9.1** All personnel of NEST are liable to follow the “Anti-Bribery, Anti-Corruption and Due Diligence” Policy. NEST is committed to ethical business practices, sustainability, and social responsibility. In addition, this Code prohibits NEST employees from offering, giving, accepting, or receiving a bribe to/from anyone.

**9.2** We have built a reputation as a company that operates ethically and honestly, and bribery and corruption have no place in our business. Bribery and corruption can cause irreparable harm to our good name, our business, and the communities where we do business.

**9.3** Employees responsibilities:

- NEST employees may never offer, promise, or give anything of value that could appear to be a payment — something that might encourage or reward someone for a decision to retain or obtain business.
- All NEST employees required to complete anti-corruption training must become familiar with and comply with the Company's Anti-Bribery and Anti-Corruption Policy, which provides more detail.

### **10. Fraud, Dishonesty or Criminal Conduct**

**10.1** NEST does not permit fraud, dishonesty, or criminal conduct. We value ethics and integrity and will not tolerate fraud, dishonesty, or criminal conduct.

- We place a great deal of trust and confidence in our employees. In return, we expect you to act ethically and honestly in everything you do. Any use of fraudulent or illegal tactics violates that trust and carries potentially severe consequences, including discipline, up to and including termination.
- NEST prohibits fraud or dishonesty in connection with Company business, including taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice or any violent activity on Company premises or while performing work for the Company.



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- If any fraud, dishonesty, or criminal conduct is detected or suspected of any employee or anyone doing business with the Company, such activities should be reported to the Management.

### **11. Safeguarding Confidential Information**

**11.1** Information is one of our most valuable assets. Business records, customer information, financial information, and intellectual property are Company assets that are essential to our operations.

**11.2** Employees responsibilities:

- You may not use any information belonging to NEST for your own personal gain. Confidential information may only be shared with NEST employees, officers, and directors who need the information in order to do their job.
- Confidential information must not be shared outside NEST without a confidentiality agreement approved by the Management. Confidentiality obligations continue even after you leave NEST.
- Any unauthorized disclosure of confidential information, whether unintentional or not, must be reported immediately to the Management.

### **12. Trade Practices**

**12.1** NEST is committed to free and fair competition and complying with all applicable antitrust laws.

**12.2** Employees responsibilities:

- Take care in your relations with competitors. You might interact with competitors through industry meetings, conferences, and other events. When you do, be careful not to make inappropriate agreements. Never engage in practices such as price fixing, customer, or market allocation, or bid rigging.
- Trade association meetings and other industry gatherings can pose certain risks, as they bring together competitors who might discuss matters of mutual concern and potentially cross the line of non-compliance with competition laws. Even joking about inappropriate topics, such as marketing or pricing strategies, could be misinterpreted and misreported. If any kind of anti-competitive discussion arises, you should refuse to discuss the matter and leave the conversation immediately.
- No employee may share any sensitive NEST business information (prices, costs, margins, research and development efforts, strategic plans, etc.) with any third party, including actual or potential competitors.
- Employees will consult with the Management before making any joint bids with competitors.
- If any inappropriate or illegal competition or antitrust conduct is detected or



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suspected of any employee or anyone doing business with the Company, such activities should be reported to Management.

- No employee may share any sensitive NEST business information with any third party, including actual or potential competitors.

### **13. Employment Practices**

**13.1** At NEST, our employees are individuals with different abilities, backgrounds, and experiences. We believe that every employee should have the opportunity to fully contribute, and the Company forbids employment discrimination or harassment based on race, color, sex (including pregnancy, childbirth, and related medical conditions), national origin, religion, age, disability, genetic information, veteran status, sexual orientation, marital status, or any other characteristic protected by applicable law.

#### **13.2** Employees responsibilities:

- NEST employees must treat each other with respect and dignity.
- Value the contributions of others as NEST does and listen to their viewpoints.
- Maintain fairness in all relationships.
- Never discriminate against anyone — including fellow employees, customers, suppliers, service providers, partners, or any other person.
- All employees who believe that discrimination or harassment has occurred should report the incident, even if they are not the target of such discrimination or harassment.
- NEST prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation relating to alleged discrimination or harassment pursuant to the applicable procedures.

### **14. Privacy**

**14.1** NEST respects the confidentiality of the personal information of its employees, customers, suppliers, and service providers. Colleagues, customers, suppliers, service providers, and many others entrust NEST with personal information and it is our responsibility to keep this information confidential.

#### **14.2** Employees responsibilities:

- Do not provide confidential or proprietary information to third parties, including business partners and vendors, without appropriate authorization and a valid confidentiality agreement.
- Be careful when using electronic means of storing and sending information.
- Do not discuss confidential information in places where you might be overheard.
- Secure all confidential information when working in an open environment.
- Properly dispose of confidential or proprietary information.
- Beware of informal telephone or email requests from outsiders seeking personal





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or confidential information (commonly known as “phishing”).

- All computers, electronic equipment, electronic data and records, Company issued phones, physical files, lockers, desks, and other furniture are the property of the Company. Employees are not entitled to, and should have no expectation of, any right of privacy as to any materials, communications, information, or files maintained, transmitted, or stored using the Company’s property and systems regardless of the nature of any such communication, material, information, or file.

### **15. Intellectual Property**

**15.1** Intellectual property that is designed, created, developed, or modified while performing work-related duties is Company property.

**15.2** Employees may not copy software provided to NEST by vendors unless the Company is licensed to make copies and the employee has received written permission from the NEST Senior Management.

### **16. Health and Safety**

**16.1** NEST is committed to providing a healthy and safe working environment in line with applicable Occupational Safety and Health Administration (OSHA) standards. As a NEST employee:

- I will ensure my safety and health and that of others.
- I will comply with safety and health procedures, requirements and instructions issued by NEST.
- I will promptly report any situation or incidence which potentially presents a hazard.

### **17. Environmental Responsibility**

**17.1** Employees should conduct NEST business in compliance with all applicable environmental laws and regulations. If you believe that an environmental hazard exists, that there has been a release of any hazardous substance, or that environmental guidelines are not being followed, you must immediately report the situation to Management.

### **18. Reporting and Accountability**

**18.1** Making proper decisions can be difficult in our complex business environment. You may occasionally need to seek advice or assistance to resolve an issue. You are encouraged to seek information or guidance about our ethics and compliance standards. Reliance is a non-retaliatory environment, making it safe for employees to raise ethics and compliance concerns in good faith.



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**18.2 Employees responsibilities:**

- Seek help if you are ever unsure on a course of action.
- NO ONE, even senior officers, has the authority to tell you to do something illegal or unethical.
- Raise concerns about any violations of our Code that you see or suspect.
- Never retaliate against anyone who makes a good faith report of suspected misconduct.
- Cooperate fully and honestly in any internal investigation of alleged misconduct.

**19. Ethics and Compliance Hotline**

**19.1** To promote ethical behavior and a culture of compliance, NEST offers Compliance Hotline phone and email-reporting tools. These tools provide all NEST employees with a way to report concerns or get information or advice (where available and permitted by law).

**19.2** All information reported through the telephone hotline and the email-reporting tool is forwarded to NEST personnel responsible for administration of the Code. You can request to receive information about the Company’s response to your concerns. You are encouraged to identify yourself when using the Compliance Hotline as this information often helps promote a thorough response or investigation.

Hotline Number:	+8801847102700
Email:	nestcare@nestbd.net

**20. Social Media**

**20.1** NEST encourages its employees to be active on social media and participate in online conversations. However, the use of social media presents certain risks and opportunities.

**20.2** As a NEST employee:

- I will always be aware of the impact of my actions on my image and ultimately NEST’s image.
- I will always exercise good judgement in posting material on social media.
- I will refer inquiries found on social media networks relating to NEST on to appropriate authority.

**21. Waivers**

**21.1** All employees, officers and directors are required to follow this Code. Waivers of this



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Code for employees and officers of the NEST must be approved by the board of Directors.

### **22. Conclusion**

**22.1** The “Employee Code of Conduct” Policy is the basic guideline of the company. Concern department must follow and abide by this policy. Any confusion or queries individuals must contact the management. However, this policy may be reviewed and modified as pre the change of government rules and institutional practices.