



AQUARIUS VISION WORKS LLP

Anti-Bribery and Anti-Corruption (ABAC) Policy

1. Purpose

The purpose of this Anti-Bribery and Anti-Corruption Policy is to ensure that Aquarius Vision Works LLP and its employees, contractors, and third-party partners comply with applicable anti-bribery and anti-corruption laws. This policy sets the standards for the prevention, detection, and reporting of bribery and other forms of corruption.

2. Scope

This policy applies to all employees, partners, officers, contractors, consultants, agents, and other third parties acting on behalf of Aquarius Vision Works LLP, whether permanent, temporary, or on a contract basis. The policy applies to all jurisdictions in which the company operates.

3. Policy Statement

Aquarius Vision Works LLP has zero tolerance for bribery and corruption. It is strictly prohibited to offer, promise, give, or accept bribes, kickbacks, or any form of improper payments to gain or retain business or a competitive advantage. All business dealings must comply with the highest standards of integrity and transparency.

4. Definitions

- **Bribery:** Offering, giving, receiving, or soliciting something of value as a means of influencing the actions of an individual holding a public or private office.
- **Corruption:** The abuse of entrusted power for private gain.
- **Facilitation Payments:** Small payments made to expedite routine governmental actions (such as issuing permits or processing visas).
- **Kickbacks:** Payments made in return for a business favor or advantage.

5. Legal Compliance

Aquarius Vision Works LLP is committed to complying with the following applicable anti-bribery and anti-corruption laws, including but not limited to:

- Indian Penal Code (IPC), 1860.
- Prevention of Money Laundering, 2002.
- Central Vigilance Commission Act, 2003.



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6. Prohibited Activities

Employees, contractors, or third parties must not:

- Offer, give, or accept bribes or illicit payments.
- Make facilitation payments, except where failure to make such payments would put personal safety at risk.
- Offer or accept gifts or hospitality that could be perceived as improper.
- Engage in money laundering or use company resources for illegal activities.

7. Gifts, Entertainment, and Hospitality

Offering or accepting gifts, entertainment, or hospitality is only acceptable if:

- It is consistent with customary business practices.
- It is reasonable and appropriate under the circumstances.
- It does not improperly influence business decisions or create a conflict of interest.
- It is not illegal under applicable laws.

8. Responsibilities

- Employees and Representatives: Must read, understand, and comply with this policy. Any suspected acts of bribery or corruption must be reported to [Compliance Department or relevant authority].
- Management: Responsible for implementing this policy, ensuring compliance, and promoting a culture of integrity.

9. Reporting Violations

Employees are required to report any violations of this policy to the [Compliance Officer/Legal Department] or through the confidential reporting hotline. Retaliation against any employee who reports a violation in good faith is strictly prohibited.

10. Consequences of Non-Compliance

Violations of this policy may result in disciplinary action, including termination of employment or business relationship. In addition, individuals involved may face civil or criminal penalties under applicable law.

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11. Training and Awareness

Aquarius Vision Works LLP will provide regular training to employees to ensure understanding and compliance with this policy. Third-party partners will also be required to comply with the anti-bribery and anti-corruption standards outlined herein.

12. Monitoring and Review

The [Compliance Officer] will monitor compliance with this policy, and periodic reviews will be conducted to ensure its effectiveness. This policy will be updated as necessary to reflect any changes in relevant laws or regulations.

13. Questions and Support

For any questions regarding this policy or to seek guidance on specific situations, employees should contact the [Compliance Officer/Legal Department].

14. Amendments

This policy was approved in the year 2024 and will be reviewed annually or when necessary due to legal or business changes.



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Confidentiality Policy

1. Purpose

This Confidentiality Policy outlines the responsibilities of all employees, contractors, and third-party associates in protecting sensitive and confidential information related to Aquarius Vision Works LLP. The policy aims to safeguard proprietary, personal, and confidential information from unauthorized disclosure, ensuring the company's business interests, intellectual property, and privacy rights are protected.

2. Scope

This policy applies to all employees, contractors, consultants, and any third parties who have access to confidential information in any form—whether written, verbal, or electronic—related to Aquarius Vision Works LLP, its clients, partners, and employees.

3. Definitions

- Confidential Information: Any non-public information that is proprietary, sensitive, or could cause harm to the company, its clients, or employees if disclosed. Examples include but are not limited to:
 - Business strategies, plans, and forecasts
 - Client and customer data
 - Intellectual property (designs, patents, trademarks)
 - Financial information
 - Personnel information
 - Trade secrets
- Authorized Disclosure: Sharing of confidential information with individuals or entities who have been granted explicit permission to receive such information for legitimate business purposes.

4. Obligations of Confidentiality

All employees, contractors, and associates must:

- Keep confidential information secure and prevent unauthorized access.
- Only use confidential information for authorized purposes related to their job responsibilities.
- Not disclose confidential information to any unauthorized party, either during their employment/contract or after termination.
- Take necessary precautions to ensure that confidential information is not inadvertently disclosed (e.g., locking computers, not discussing confidential matters in public places).



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5. Handling of Confidential Information

- **Physical Security:** Documents containing confidential information must be stored in secure locations and only accessed by authorized personnel.
- **Electronic Security:** Confidential information stored electronically must be protected using secure systems, such as encryption, password protection, and network firewalls. Access should be limited based on the principle of least privilege.
- **Third-Party Disclosures:** Any sharing of confidential information with third-party entities (e.g., vendors, contractors) must be governed by a Non-Disclosure Agreement (NDA) or a similar binding contract.

6. Exceptions to Confidentiality

Confidential information may be disclosed in the following limited circumstances:

- When required by law, regulation, or legal process (e.g., a court order or subpoena).
- When explicit, written permission is granted by the owner of the confidential information.
- When necessary to prevent significant harm (e.g., public safety concerns).

7. Reporting Breaches

Any known or suspected breach of confidentiality must be reported immediately to the [Designated Contact Person, e.g., Compliance Officer]. All reports will be investigated, and appropriate corrective actions will be taken.

8. Disciplinary Actions

Failure to comply with this policy may result in disciplinary actions, including but not limited to termination of employment, legal action, or financial penalties, depending on the severity of the breach.

9. Review and Amendments

This policy will be reviewed annually or as required by changes in the law or business operations. Amendments to this policy will be communicated to all relevant parties.

10. Acknowledgment

All employees, contractors, and third parties must acknowledge that they have read, understood, and agree to comply with this policy by signing a confidentiality agreement upon onboarding or contract initiation.



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Disciplinary Policy

Purpose

This disciplinary policy outlines the process for addressing misconduct and ensuring a fair, consistent, and transparent approach to discipline within the organization. The policy aims to maintain high standards of behavior, foster a positive working environment, and safeguard the rights of all employees.

Scope

This policy applies to all employees of Aquarius Vision Works LLP, including permanent, temporary, and part-time staff, as well as contractors and consultants.

Principles

- **Fairness and Transparency:** The disciplinary process will be carried out fairly, consistently, and transparently.
- **Right to Representation:** Employees have the right to be accompanied by a colleague or trade union representative at any formal disciplinary hearing.
- **Opportunity to Respond:** Employees will be given the opportunity to respond to any allegations before any disciplinary action is taken.
- **Confidentiality:** Disciplinary matters will be treated confidentially, and information will only be shared on a need-to-know basis.

Misconduct

Misconduct can be classified into two main categories: **Minor Misconduct** and **Gross Misconduct**.

1. Minor Misconduct

- Examples:
 - Unauthorised absence from work
 - Minor breaches of company policy
 - Insubordination
 - Poor timekeeping
- Consequences:
 - Verbal Warning
 - Written Warning (for repeated offenses)

2. Gross Misconduct

- Examples:
 - Theft or fraud
 - Physical violence or threats
 - Serious breach of health and safety rules
 - Harassment or discrimination



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- Consequences:
 - Immediate suspension (pending investigation)
 - Dismissal

Disciplinary Procedure

1. Informal Resolution

- Wherever possible, minor issues should be resolved informally through constructive feedback and coaching. Managers are encouraged to have open discussions with employees to resolve concerns before escalating to formal procedures.

2. Formal Procedure

- **Investigation:** In cases of serious or repeated misconduct, an investigation will be conducted to gather all relevant facts. The employee involved will be notified and may be asked to provide a statement.
- **Disciplinary Hearing:** If the investigation finds evidence of misconduct, a formal disciplinary hearing will be scheduled. The employee will be informed in writing of the hearing details, including the allegations and any evidence.
- **Outcome and Action:** Based on the evidence, the disciplinary hearing may result in one or more of the following actions:
 - No action
 - Verbal Warning
 - Written Warning
 - Final Written Warning
 - Dismissal

3. Appeal

- Employees have the right to appeal any formal disciplinary decision. An appeal must be submitted in writing within 5 days of the receipt of the decision. The appeal will be reviewed by a different manager or senior leader who was not involved in the original disciplinary process.

Timeframes

- **Warnings:** Verbal and written warnings will remain active for [3 months] before they are considered spent, provided there are no further incidents of misconduct.
- **Gross Misconduct:** Cases of gross misconduct may lead to immediate dismissal without notice or pay in lieu of notice.

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Record-Keeping

All records relating to disciplinary matters will be kept confidential and maintained in the employee's personnel file for the duration of the active warning period. Once the warning has expired, it will be removed from the employee's record.

Policy Review

This policy will be reviewed periodically to ensure it remains compliant with legal standards and reflects the values of Aquarius Vision Works LLP.

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Diversity and Inclusion Policy

1. Purpose

At Aquarius Vision Works, we are committed to fostering a diverse and inclusive environment where every individual feels respected, valued, and empowered. We believe that embracing differences in age, gender, race, ethnicity, sexual orientation, disability, religion, and background enhances our culture and drives innovation, creativity, and success.

2. Scope

This policy applies to all employees, contractors, volunteers, and stakeholders of Aquarius Vision Works, at all levels and in all locations where the organization operates.

3. Policy Statement

Aquarius Vision Works values diversity and aims to create a workplace that reflects the diverse communities we serve. We are dedicated to promoting equality of opportunity and prohibiting discrimination or harassment in any form.

4. Core Principles

We are guided by the following principles:

- **Equal Opportunity:** We provide equal employment opportunities to all employees and applicants based on merit, qualifications, and abilities.
- **Inclusive Culture:** We promote an inclusive environment where everyone can contribute and thrive, free from discrimination or harassment.
- **Respect and Dignity:** We treat all individuals with dignity, ensuring that differences are respected, and fostering a culture of mutual understanding.
- **Education and Awareness:** We are committed to ongoing education and awareness to prevent discrimination and foster an inclusive environment.

5. Commitment to Diversity and Inclusion

- **Recruitment and Hiring:** We strive to attract a diverse range of candidates by implementing inclusive hiring practices.
- **Professional Development:** We encourage growth through mentoring, coaching, and training programs that promote diverse talent.
- **Pay Equity:** We are committed to closing any pay gaps and ensuring fair compensation regardless of gender, race, or background.
- **Inclusive Leadership:** We ensure that our leadership reflects the diversity of our workforce and empowers voices from all backgrounds.



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- Accessible Workplace: We will make accommodation to support individuals with disabilities and ensure accessibility in all aspects of our work.

6. Reporting and Accountability

We encourage employees to report any behavior that contradicts our Diversity and Inclusion Policy. Complaints will be taken seriously and handled confidentially, with appropriate action taken to address any violations.

7. Monitoring and Evaluation

Aquarius Vision Works will continuously monitor our diversity and inclusion efforts. We will review this policy regularly to ensure it remains effective and aligned with best practices.

8. Responsibility

All employees share the responsibility to uphold this policy. Managers are expected to lead by example and ensure that diversity and inclusion principles are integrated into their teams and operations.

9. Non-Retaliation

Retaliation against individuals who report discriminatory practices or participate in investigations related to diversity and inclusion is strictly prohibited.

10. Conclusion

At Aquarius Vision Works, diversity and inclusion are essential to our mission. We are committed to creating an environment where everyone can succeed, feel valued, and contribute meaningfully to our success.

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Equal Employment Opportunity (EEO) Policy

Policy Statement

Aquarius Vision Works LLP is committed to creating a diverse and inclusive workplace where all individuals are treated with dignity and respect. We believe in fostering an environment that embraces and encourages the unique contributions of every employee. We are an Equal Employment Opportunity employer and prohibit discrimination or harassment of any kind.

Scope

This policy applies to all employees, applicants for employment, interns (paid or unpaid), contractors, and volunteers.

Equal Employment Opportunity Commitment

Aquarius Vision Works LLP is committed to providing equal employment opportunities to all individuals regardless of:

- Race
- Color
- Religion
- Gender
- Gender Identity or Expression
- Sexual Orientation
- National Origin
- Ancestry
- Age
- Disability (physical or mental)
- Genetic Information
- Marital Status
- Veteran Status
- Pregnancy or any related medical condition
- Any other characteristic protected by applicable local laws.

Employment Practices

Equal employment opportunity will be extended to all employment practices, including but not limited to:

- Recruitment and Hiring
- Job Assignments
- Promotions
- Compensation
- Benefits



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- Transfers
- Termination
- Training and Development
- Leaves of Absence

All employment decisions will be based on merit, qualifications, and business needs.

Reasonable Accommodation

Aquarius Vision Works LLP will provide reasonable accommodations to qualified individuals with disabilities or religious beliefs unless doing so would cause an undue hardship to the company. If you need accommodation, please contact Human Resources.

Anti-Harassment

Harassment or discrimination based on any protected characteristic outlined in this policy is strictly prohibited. Any form of harassment, including sexual harassment, bullying, or hostile work environments, will not be tolerated.

Reporting Violations

If you believe you have been subjected to discrimination or harassment, or if you have witnessed such behavior, you are encouraged to report it immediately to your supervisor, Human Resources, or any designated personnel. All reports will be treated confidentially to the extent possible and will be promptly investigated.

No Retaliation

Aquarius Vision Works LLP prohibits retaliation against any individual who reports discrimination or harassment, participates in an investigation, or opposes any unlawful employment practice. Any form of retaliation will result in disciplinary action, up to and including termination.

Policy Review

This policy will be reviewed and updated periodically to ensure compliance with legal standards and to reflect the company's ongoing commitment to diversity and inclusion.

Contact Information

For any questions or concerns regarding this policy, or to request assistance, please contact HR department.



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Grievance Redressal Policy

1. Purpose

The purpose of this Grievance Redressal Policy is to ensure that all stakeholders, including employees, customers, and partners, can raise their concerns or complaints related to organizational practices, services, or policies in a transparent, fair, and effective manner. The policy aims to address grievances promptly and ensure appropriate remedial action is taken to resolve issues.

2. Scope

This policy applies to all employees, customers, vendors, and stakeholders associated with the organization who may have grievances regarding any aspect of the company's services, practices, or decisions.

3. Definitions

- **Grievance:** Any concern or complaint raised by an individual or group regarding any act, decision, or service that negatively impacts them.
- **Complainant:** The person or group filing the grievance.
- **Grievance Officer/Committee:** The appointed personnel or committee responsible for managing the grievance process.

4. Principles

- **Transparency:** The grievance process will be transparent and accessible to all.
- **Fairness:** All complaints will be addressed impartially and objectively.
- **Confidentiality:** The identity of the complainant and any details shared will be kept confidential unless disclosure is required by law.
- **Timeliness:** All grievances will be acknowledged and addressed within a defined timeline.
- **No Retaliation:** Complainants will not face any retaliation or adverse consequences for raising concerns in good faith.

5. Procedure for Raising Grievance

5.1 Informal Grievance Resolution

- **Initial Communication:** The complainant is encouraged to discuss their concern informally with the immediate supervisor, department head, or responsible authority.
- **Resolution Timeframe:** Every effort should be made to resolve the grievance informally within 5 working days.

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5.2 Formal Grievance Submission

If the issue remains unresolved, the complainant may file a formal grievance as follows:

- **Submission:** A formal grievance should be submitted in writing to manager or via email to manager/HR. The complainant must provide:
 - A detailed description of the grievance.
 - Any supporting evidence.
 - The relief or action being sought.
- **Grievance Officer/Committee Appointment:** Upon receiving a formal grievance, the Grievance Officer/Committee will be appointed to review and investigate the issue.
- **Acknowledgment:** The grievance will be acknowledged within 3 working days of receipt.

6. Investigation and Resolution

- **Review:** The Grievance Officer/Committee will review the grievance and may interview relevant parties or request further information if necessary.
- **Timeline:** The investigation should be completed within 10 working days. If additional time is needed, the complainant will be informed of the extended timeline.
- **Resolution:** A formal response will be provided to the complainant detailing the findings of the investigation and the proposed resolution.
- **Appeal:** If the complainant is not satisfied with the resolution, they may appeal the decision within 5 working days of receiving the response. The appeal will be reviewed by senior management, and a final decision will be communicated within 10 working days.

7. Monitoring and Reporting

The Grievance Officer/Committee will maintain a record of all grievances, investigations, and resolutions. These records will be reviewed periodically to identify trends or systemic issues and recommend improvements to company policies or procedures.

8. Roles and Responsibilities

- **Complainant:** Responsible for providing complete and accurate information regarding the grievance.
- **Grievance Officer/Committee:** Responsible for ensuring grievances are addressed fairly, objectively, and within the established timeline.
- **Senior Management:** Responsible for reviewing appeals and ensuring the overall effectiveness of the grievance redressal process.

9. Confidentiality

All information regarding the grievance will be kept confidential and shared only with those directly involved in the investigation and resolution process.



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10. Review of Policy

This policy will be reviewed annually or as necessary to ensure its effectiveness and compliance with applicable laws and regulations.

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Human Rights and Forced Labour Policy

1. Purpose

Aquarius Vision Works LLP is committed to respecting and promoting human rights in all areas of our operations. We recognize our responsibility to ensure that forced labor, human trafficking, and other forms of modern slavery have no place in our business or supply chain. This policy outlines our commitment to protecting human rights and our approach to preventing and addressing forced labor.

2. Scope

This policy applies to all employees, contractors, suppliers, and partners involved in our business operations, regardless of location. It covers all activities within our direct operations and supply chain.

3. Definitions

- **Human Rights:** Fundamental rights and freedoms to which all people are entitled, including but not limited to the right to fair treatment, freedom from discrimination, access to decent working conditions, and freedom from forced or child labor.
- **Forced Labor:** Any work or service that a person is compelled to perform under threat of punishment and for which the person has not offered themselves voluntarily.
- **Child Labor:** Work performed by a child below the minimum legal working age as defined by local laws or international standards.

4. Commitment to Human Rights

Aquarius Vision Works LLP aligns its practices with local and internationally recognized human rights standards, including the Universal Declaration of Human Rights and the International Labor Organization's (ILO) core labor standards. We are committed to ensuring that:

- All individuals are treated with respect and dignity.
- No person is subjected to forced labor, bonded labor, or any form of involuntary work.
- Workers have the right to freely choose employment and to leave it at any time without fear of retaliation.
- We provide safe and fair working conditions, including fair wages and working hours.



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5. Prohibition of Forced and Child Labor

Aquarius Vision Works LLP strictly prohibits the use of forced labor, whether in the form of prison labor, indentured labor, bonded labor, or any other form of involuntary work. We also do not tolerate the use of child labor in any of our operations or supply chain.

- All employment must be freely chosen, and no worker should be coerced into employment.
- Workers must not be required to lodge deposits, identity papers, or any form of collateral as a condition of employment.
- Children under the age of 18 must not perform hazardous work or work that interferes with their education or development.

6. Due Diligence and Risk Assessment

We are committed to conducting due diligence in order to identify, prevent, and mitigate human rights abuses, including forced labor, in our operations and supply chain. This includes:

- Conducting regular risk assessments to identify areas where human rights violations may occur.
- Auditing suppliers and partners to ensure they comply with this policy.
- Engaging with external stakeholders, including NGOs, labor unions, and human rights experts, to continuously improve our approach.

7. Supplier Standards

All suppliers and business partners are expected to adhere to Aquarius Vision Works LLP 's Human Rights and Forced Labour Policy. We require our suppliers to:

- Implement policies that prevent forced labor and human rights abuses.
- Provide workers with clear, accessible contracts in a language they understand.
- Prohibit the retention of personal identification documents and deposits from workers.
- Allow workers to terminate their employment freely without penalty.

We reserve the right to terminate relationships with suppliers and partners who fail to comply with this policy.



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8. Training and Awareness

Aquarius Vision Works LLP provides training to all employees, especially those involved in procurement, Human Resources and supply chain management, to ensure awareness of this policy and the risks of forced labor and human rights violations. We are committed to building a culture of respect for human rights across our organization.

9. Reporting and Accountability

We encourage employees, suppliers, and other stakeholders to report any concerns or potential violations of this policy. Reports can be made anonymously and without fear of retaliation. Aquarius Vision Works LLP is committed to investigating all reports and taking appropriate corrective action if any violation is found.

10. Monitoring and Continuous Improvement

We will regularly review and update this policy to ensure it remains relevant and effective. We will also continuously monitor our own operations and those of our suppliers to ensure compliance with this policy and applicable laws.

11. Conclusion

At Aquarius Vision Works LLP, we are dedicated to ensuring that human rights are respected and that forced labor is eradicated from all aspects of our business. By upholding this policy, we aim to contribute to a fair, safe, and equitable working environment for all.



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Recruitment Policy

1. Purpose

The purpose of this Recruitment Policy is to establish clear guidelines and procedures for hiring employees in a fair, transparent, and efficient manner. The goal is to attract, select, and retain qualified individuals while ensuring equal employment opportunities and compliance with relevant labor laws.

2. Scope

This policy applies to all employees involved in the recruitment process, including HR personnel, department heads, and hiring managers. It covers recruitment, selection, and onboarding processes for full-time, part-time, and temporary employees.

3. Equal Employment Opportunity

We are committed to providing equal opportunities in employment and do not discriminate on the basis of race, color, religion, gender, sexual orientation, national origin, age, disability, or any other status protected by law. All recruitment decisions will be based solely on merit, qualifications, and the needs of the business.

4. Recruitment Process

4.1. Identifying Vacancies

Vacancies may arise due to staff turnover, organizational growth, or the creation of new roles. Department heads must submit a request to the HR department outlining the necessity and justification for new hires.

4.2. Job Description and Specification

Each role must have a clear job description and specification, detailing key responsibilities, qualifications, and skills required. Job descriptions will be reviewed periodically to ensure they reflect current needs.

4.3. Internal Recruitment

Wherever possible, current employees will be given the opportunity to apply for open positions. Vacancies will be posted on internal noticeboards or the company's intranet. Internal candidates are encouraged to discuss their interest in an open position with their immediate supervisor.



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4.4. External Recruitment

If no suitable internal candidates are available, external recruitment efforts will be initiated. This may include posting vacancies on job boards, the company website, social media, and engaging recruitment agencies, if necessary.

5. Selection Process

5.1. Screening and Shortlisting

The HR department will screen all applications to ensure candidates meet the minimum qualifications and experience requirements. Shortlisted candidates will be sent to the relevant department for review.

5.2. Interview Process

Candidates will undergo one or more interviews. Interviews will be structured to assess the candidate's suitability for the role and their alignment with the company's values. Interview panels should consist of HR representatives, department heads, and any other relevant stakeholders.

5.3. Assessment and Testing

Where applicable, candidates may have to complete skills tests, personality assessments, or other relevant evaluations to determine their capability for the role.

5.4. Reference and Background Checks

Offers of employment are conditional upon satisfactory reference checks, and, where applicable, background checks. Candidates must provide references from recent employers, and further checks may be conducted based on the role's requirements.

6. Offer and Onboarding

6.1. Job Offer

Once a candidate is selected, HR will issue a formal offer letter outlining the job title, salary, benefits, and terms of employment. The offer is subject to the candidate's acceptance and successful completion of any background checks or other pre-employment conditions.

6.2. Onboarding

HR will coordinate the onboarding process, ensuring new employees are welcomed, receive an induction, and are provided with necessary training. Department heads must ensure the employee has all the resources and support needed for a smooth transition into their role.

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7. Confidentiality

All information related to candidates, including application materials, interviews, assessments, and offers, must be kept confidential and only shared with those directly involved in the recruitment process.

8. Monitoring and Evaluation

The HR department will monitor recruitment processes to ensure they remain efficient, transparent, and in compliance with company policies and legal obligations. Periodic reviews of recruitment outcomes will be conducted to evaluate the effectiveness of hiring strategies and identify areas for improvement.

9. Policy Review

This policy will be reviewed annually, or as necessary, to ensure it remains aligned with legal requirements and business needs.

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Safety, Health, and Environment (SHE) Policy

1. Introduction

At Aquarius Vision Works, we are committed to ensuring the highest standards of safety, health, and environmental protection in all aspects of our operations. We believe that all accidents, injuries, and environmental incidents are preventable, and we are dedicated to protecting our employees, stakeholders, and the communities in which we operate.

This policy outlines our commitment to maintaining a safe, healthy, and environmentally responsible workplace. We strive for continuous improvement in SHE performance through compliance with applicable laws, best practices, and employee engagement.

2. Policy Objectives

Our SHE policy is designed to:

- **Protect Health and Safety:** Prevent accidents, injuries, and work-related illnesses by ensuring that safety measures and health protocols are integrated into every operation.
- **Environmental Stewardship:** Minimize our environmental footprint by reducing waste, conserving resources, and preventing pollution.
- **Compliance:** Ensure full compliance with all applicable legal and regulatory requirements concerning safety, health, and environmental protection.
- **Continuous Improvement:** Promote a culture of continuous improvement through regular assessments, training, and the adoption of best practices.

3. Responsibilities

- **Management:** Provide leadership, allocate resources, and set clear expectations for SHE performance. Ensure SHE goals are communicated effectively, and monitor compliance with policy objectives.
- **Employees:** Take personal responsibility for safety and health by following SHE policies, procedures, and reporting unsafe practices or conditions. Participate in SHE training programs and stay informed of best practices.



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- **Contractors and Suppliers:** Ensure that all contractors and suppliers adhere to the SHE requirements, and work with us to minimize SHE risks in operations.
- **SHE Committee:** Regularly review SHE performance, investigate incidents, and make recommendations for continuous improvement.

4. Safety Commitment

We are committed to:

- Identifying hazards and assessing risks to prevent injuries and work-related illnesses.
- Providing appropriate training, tools, and equipment for safe work practices.
- Promoting a culture of proactive safety through continuous monitoring and reporting.
- Ensuring that emergency response plans are in place and communicated to all employees.

5. Health Commitment

We are committed to:

- Promoting wellness and a healthy work-life balance.
- Providing access to health resources and supporting programs that address occupational and non-occupational health issues.
- Monitoring workplace conditions to ensure compliance with health standards.
- Implementing policies to prevent occupational illnesses and mitigate health risks.

6. Environmental Commitment

We are committed to:

- Reducing energy consumption, water use, and waste generation.
- Implementing pollution prevention practices and minimizing emissions.
- Encouraging sustainable resource use throughout the supply chain.
- Supporting biodiversity and protecting natural habitats in the regions where we operate.

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7. Continuous Improvement and Review

We will regularly review and update this policy to ensure its effectiveness and relevance to our operations. Performance indicators and internal audits will be used to measure progress, and we will incorporate lessons learned from incidents and industry advancements.

8. Communication and Engagement

We will communicate this policy to all employees, contractors, suppliers, and stakeholders. Regular SHE training sessions will be held, and feedback from employees and external partners will be encouraged to enhance SHE outcomes.

9. Commitment to Compliance

We pledge to adhere to all applicable laws and regulations related to safety, health, and the environment. We will also participate in external audits and certifications where appropriate to demonstrate our commitment to SHE excellence.

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Social Media and Internet Use Policy Draft

1. Purpose

This policy outlines the acceptable use of social media and the internet to ensure that employees use these tools responsibly, professionally, and in line with the company's values, privacy requirements, and legal obligations.

2. Scope

This policy applies to all employees, contractors, and temporary staff who use social media platforms or access the internet while representing the company or using company resources.

3. General Guidelines

- **Compliance with Laws and Company Policies:** Employees must adhere to all applicable laws, including copyright, privacy, and intellectual property rights, and comply with company policies regarding conduct, confidentiality, and ethics.
- **Professional Representation:** Employees are representatives of the company. When posting or engaging on social media, employees should ensure their communication is professional, respectful, and does not reflect negatively on the company.
- **Company Resources:** The company's internet access and IT systems are primarily for business use. Limited personal use is permitted but must not interfere with work duties, consume excessive resources, or violate company policy.

4. Use of Social Media in Professional Capacity

- **Authorized Use:** Only employees authorized by the company can post on social media on behalf of the organization. All official communications must be reviewed by the marketing or communications team.
- **Company Accounts:** Employees managing official social media accounts must ensure that content is accurate, consistent with company branding, and aligned with the company's objectives.
- **Personal Accounts:** Employees must clarify when opinions expressed are personal and not those of the company. Do not use company logos or branding in personal social media profiles or posts unless authorized.

5. Use of the Internet at Work

- **Business Purposes:** Employees should use the internet for work-related research, communication, and tasks. Employees are expected to refrain from excessive personal use or accessing inappropriate content (e.g., gambling, pornography, hate speech).



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- **Monitoring:** The company reserves the right to monitor employees' internet use to ensure compliance with this policy. All activities carried out on company networks or devices may be subject to review.

6. Data Privacy and Security

- **Confidential Information:** Employees must not share confidential company information, trade secrets, customer data, or sensitive personal information online.
- **Security Protocols:** Employees must follow company security guidelines when using social media and the internet, including using strong passwords, updating software regularly, and avoiding suspicious links or websites.

7. Prohibited Conduct

- **Defamation and Harassment:** Employees are prohibited from using social media or the internet to harass, defame, or discriminate against colleagues, customers, or third parties.
- **Inappropriate Content:** Posting or sharing content that is obscene, violent, discriminatory, or otherwise offensive is prohibited.
- **Conflict of Interest:** Employees should avoid using social media to engage in activities that conflict with the interests of the company, such as promoting competing businesses.

8. Consequences of Policy Violation

Non-compliance with this policy may result in disciplinary action, including suspension or termination of employment, depending on the severity of the violation.

9. Policy Review

This policy will be reviewed annually to ensure it remains up-to-date with evolving legal standards and technological changes.

N. Sharma



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Whistleblower Policy

1. Purpose

The purpose of this Whistleblower Policy is to provide a mechanism for employees, contractors, and stakeholders to report concerns about unethical, illegal, or fraudulent activities within the organization without fear of retaliation. This policy is intended to encourage open communication and foster an ethical culture within the organization.

2. Scope

This policy applies to all employees, contractors, suppliers, vendors, and any other parties engaged with the organization.

3. Definition of Whistleblowing

Whistleblowing is the act of reporting suspected unethical, illegal, or fraudulent activity within the organization. Such activities may include, but are not limited to:

- Financial misconduct (e.g., fraud, theft, misrepresentation)
- Violation of laws, regulations, or company policies
- Environmental hazards
- Workplace harassment or discrimination
- Safety concerns
- Misuse of company assets

4. Reporting Procedure

Any individual who has knowledge of, or a reasonable belief that, unethical or illegal activities are occurring within the organization is encouraged to report their concerns. Reports can be made through the following channels:

- Internal Reporting Line: [Provide contact details such as email, phone, or online portal]
- Anonymous Reporting: Reports may be made anonymously if desired through [anonymous reporting mechanism details].
- Supervisor: Reports can be made to the immediate supervisor or any other management personnel.

All reports will be treated confidentially and investigated promptly.

5. Investigation Process

Upon receiving a report, the following steps will be taken:



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1. **Acknowledgement:** The whistleblower will receive an acknowledgment of the report within [number] business days, if contact information is provided.
2. **Initial Assessment:** An initial assessment of the report will be conducted to determine whether further investigation is warranted.
3. **Investigation:** If necessary, a formal investigation will be carried out by a designated team, which may include legal, HR, or external advisors.
4. **Outcome:** Upon conclusion of the investigation, appropriate action will be taken, which may include disciplinary action, policy revisions, or legal recourse. The whistleblower will be informed of the outcome if possible, while maintaining confidentiality.

6. Protection Against Retaliation

Retaliation against a whistleblower is strictly prohibited. Any form of harassment, demotion, suspension, or discrimination against an individual for reporting concerns in good faith will not be tolerated. Disciplinary action, including termination, may be taken against any employee who retaliates against a whistleblower.

7. False Claims

This policy is designed to protect individuals who report concerns in good faith. However, if an individual knowingly makes a false report or provides false information, disciplinary action may be taken against that individual.

8. Confidentiality

The organization will make every effort to protect the confidentiality of whistleblowers. Information about the report will only be shared with individuals on a need-to-know basis during the investigation process.

9. Reporting to External Authorities

In certain circumstances, individuals may be required or encouraged to report concerns to external regulatory authorities. The organization will provide support to whistleblowers who choose to take this step in compliance with applicable laws.

10. Review of Policy

This policy will be reviewed annually or as needed to ensure its continued effectiveness and compliance with legal requirements.



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Code of Ethics and Business Conduct Policy

1. Purpose

The purpose of this Code of Ethics and Business Conduct Policy is to provide clear guidance to employees, officers, and partners of Aquarius Vision Works LLP on ethical standards and expectations for behavior. We are committed to conducting our business with integrity, responsibility, and accountability. This policy outlines the core principles we expect all team members to follow to ensure that our business maintains its commitment to ethical practices.

2. Scope

This policy applies to all employees, contractors, officers, and Partners of Aquarius Vision Works LLP and any subsidiaries or affiliates. All must abide by this code in their business interactions, both within the company and externally with clients, vendors, competitors, and the general public.

3. Core Ethical Principles

3.1 Integrity

Employees must act with honesty, fairness, and transparency in all business dealings. We expect team members to maintain the highest ethical standards when making decisions on behalf of Aquarius Vision Works LLP.

3.2 Compliance with Laws

All employees must comply with local, state, National, and international laws, as applicable. It is the responsibility of each employee to understand and follow all laws and regulations relevant to their role.

3.3 Respect and Fair Treatment

We value diversity and inclusion. Every employee, customer, vendor, and stakeholder should be treated with respect and fairness, without any form of discrimination, harassment, or unethical bias. All decisions should be based on merit, ensuring equal opportunities for all.

3.4 Conflicts of Interest

Employees must avoid situations where personal interests conflict with the interests of Aquarius Vision Works LLP. If a conflict of interest arises, it must be disclosed immediately to the supervisor or the compliance officer.



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3.5 Confidentiality

Confidential information concerning the company, its customers, employees, and business partners must be protected. Employees must not disclose confidential information without authorization, and any disclosure of such information must be in compliance with applicable laws and regulations.

3.6 Fair Competition

We are committed to fair competition and do not tolerate any forms of bribery, price fixing, or unethical competition practices. Employees must avoid any actions that could result in unfair business practices or anti-competitive behavior.

3.7 Environmental Responsibility

We strive to conduct business in an environmentally responsible manner and minimize our environmental footprint. Employees should promote sustainability and comply with all relevant environmental laws and policies.

4. Reporting Violations

Employees are encouraged to report any known or suspected violations of this policy to their supervisor or to the compliance department. Aquarius Vision Works LLP prohibits any form of retaliation against employees who, in good faith, report violations of the code or any other illegal or unethical behavior.

5. Disciplinary Actions

Any violation of this code may result in disciplinary action, including termination of employment, legal action, or other corrective measures as deemed appropriate. The severity of the disciplinary action will depend on the nature of the violation and the circumstances involved.

6. Acknowledgment

All employees must review this Code of Ethics and Business Conduct Policy and acknowledge their understanding and commitment to abide by the principles outlined herein.

N. Sharma